

McDonnell Douglas Aerospace

MCDONNELL DOUGLAS



27 May 1997

6/1 PCB  
464C-GSB-4064

RECEIVED

JUN 02 1997

HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Mr. Robert L. Krager  
Missouri Department of Natural Resources  
Division of Environmental Quality  
P.O. Box 176  
Jefferson City, Missouri 65102-0176

Dear Mr. Krager:

Thank you for the opportunity to provide additional information related to your May 13-14, 1997 inspection of the McDonnell Douglas Aerospace - St. Louis (MDA) PCB Management Program. We would like to provide additional information relating to your summary of observations.

Item one of your summary related to an exception report MDA submitted on June 10, 1996, in accordance with 40 CFR 761.215. Although MDA may have initiated transport of the PCB waste more than nine months after the date it was removed from service, MDA had made explicit arrangements with our contractor for expedited processing, to assure proper disposal within the required one year time frame. However, this expedited processing was not accomplished, resulting in the filing of the exception report. MDA has work practices in place to assure timely initiation of transport of PCB waste within nine months of the date such waste is removed from service.

The second item on your summary identified an inaccuracy in the Annual Report Document for 1994. The 1994 Annual Document was amended on May 14, 1997. The number of PCB Transformers in service was changed from six (6) to four (4).

Two transformers, SN 2710-1 and SN 2711-2 will require a scheduled shutdown of electrical service to Building 6. (Item 3 on the Summary of Observations). Necessary clean up and repairs will be completed upon an approval date for this shutdown.

The Wagner transformer, SN 9111235 and the Maloney transformer, SN 2126050 were cleaned on May 20, 1997. (Items 4 and 5 on the Summary of Observations) Necessary unit repairs are being addressed. MDA solicited bids from contractors to repair and retrofill these units at Substation 8. Additional details from the successful contractor have been requested and are needed to establish a specific date for the work to begin.

The Pennsylvania transformer (SN 2889-1) supplies MDA's Industrial Wastewater Treatment Facility (WWTF). A scheduled shutdown of the WWTF and the chemical processing operations is needed to properly clean and repair this transformer. Necessary repairs will be completed upon an approval date for this shutdown.

In response to your question by telephone, Transformer 6147465 was transported for disposal on July 23, 1991. Because MDA was unable to collect a sample from this transformer we chose to manifest this unit as a PCB transformer.

If further information is needed, please advise.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Buford".

Gary Buford  
Environmental and Hazardous Material Services  
Dept. 464C, Bldg. 110, Mailcode S111-1099  
(314) 234-8171

40 CFR 761.180 (a) (1)

Quantities of PCBs and PCB Items Removed From Service and  
Placed Into Storage for Disposal During 01 January 1994 and 31  
December 1994.

(i)	Total weight of PCBs and PCB Items in Containers	16,080 (Kg.)
	Liquids:	0 (Kg.)
	Capacitors:	0 (Kg.)
	PCB Contaminated Material:	622 (Kg.)
	Non-Regulated Ballasts:	15,458 (Kg.)
(ii)	Total number of PCB Transformers:	4 (Kg.)
	Total weight of PCBs contained in Transformers:	40,479 (Kg.)
(iii)	Total number of PCB Large Capacitors:	0

A printout is attached that contains information on each individual container, transformer and large capacitor.

\* THIS DOCUMENT WAS AMENDED ON 05/14/96.

Signature: \_\_\_\_\_

*Sam B. [Signature]*

## **PCB INSPECTION REPORT**

**McDonnell Douglas Aerospace**  
**140 McDonnell Boulevard**  
**P.O. Box 516, Mailcode S1111099**  
**St. Louis, MO 63166**  
**Telephone: (314) 234-8171**

**Date: May 12, 1997**  
**Inspection No.: 051297M001T01**  
**Docket No.: 07-97-T-229**

### **INTRODUCTION**

This facility was selected for a "For Cause" inspection. The U.S. Environmental Protection Agency, Region VII (EPA) received a one-year exception report from McDonnell Douglas Aerospace (MOA), indicating they did not dispose of one drum of PCB-contaminated oil (Attachment 1). The EPA Region VII randomly selects several of the one-year exception reports for "For Cause" inspections. The inspection was to determine compliance with PCB regulations Codified at 40 CFR Part 761.

### **SUMMARY OF OBSERVATIONS**

The following possible deviations for PCB regulations were observed during the inspection:

1. Failure to dispose of one drum of PCB-contaminated oil (Drum No. 9431) within the required one-year time frame;
2. Failure to provide a complete annual document for 1994;
3. Failure to provide a complete annual document for 1991;
4. Improper disposal due to two untested transformers leaking oil from the lid and/or bushings at Building 6;
5. Improper disposal due to the PCB-contaminated Wagner transformer, SN 9U1235, leaking around the bushings and drain valve;
6. Improper disposal due to PCB-contaminated Moloney transformer, SN226050, leaking around the lower drain valve and tap changer;
7. Improper disposal due to untested Pennsylvania transformer, SN2689-1, leaking around the bushings and fins; and
8. Improper disposal due to untested Kuhlman transformer, SN04729, leaking around the oil level gauge and bushings.

No samples were collected. Thirty-six documents were collected and are included in Attachments 7 - 45 of this report. Seventeen photographs were taken and are included in Attachment 46.

### **HISTORY OF BUSINESS**

MDA designs and manufactures civilian and military aircraft, as well as missiles and other aerospace equipment. They occupy over 50 buildings on several hundred acres of property (see map Attachment 7). MDA employs about 25,000 people.

Mr. Harry Stonecipher is the Chief Executive Officer, and his address is McDonnell Douglas Aerospace, P.O. Box 516, Mailcode 1001080, St. Louis, MO 63166.



## **PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES**

Mr. David Shanks, Principal Environmental Specialist, was interviewed. Mr. Shanks signed and received copies of the Notice of Inspection and Confidentiality Notice.

Mr. Gary Buford, Environmental Specialist, was also interviewed. Mr. Buford signed and received copies of the Receipt for Samples, Declaration of CBI, and Summary of Observations. He accompanied me during the physical inspection, provided a history of the business, and was present for the closing discussion.

Mr. Bryan Kury, Manager, Environmental & Hazardous Materials Service, was also interviewed. Mr. Kury was present for the closing discussion.

Mr. Joseph Haake, Group Manager, was also interviewed. Mr. Haake was present for the closing discussion.

Mr. Donald Hagar, Electrical Foreman, was also interviewed. Mr. Hagar was present for the physical inspection of Substations 8 and 20.

## **INSPECTION**

On May 12, 1997, at about 1:15 p.m., I, Robert Krager, presented my credentials to Mr. David Shanks, Principal Environmental Specialist. I advised Mr. Shanks that MDA had been selected for a "For Cause" inspection because of a one-year exception report received by EPA. I issued the Notice of Inspection and Confidentiality Notice to Mr. Shanks who signed both. Mr. Shanks said there would be no claim of confidentiality.

Mr. Shanks said Mr. Gary Buford, Environmental Specialist, was responsible for the PCB records, but he was out of the office. I said we could do the physical inspection first. Mr. Buford returned just as we were leaving for the PCB storage area. I presented my credentials to Mr. Buford and explained the reason for the inspection.

Mr. Buford and I proceeded to the PCB storage area. The outside of the PCB storage building was marked M<sub>L</sub> (Photo 1). Inside the PCB storage building were 11 drums of light ballasts, one drum of large capacitors, and one drum of oil containing 870 parts per million (ppm) PCBs (Photos 2 and 3). I asked Mr. Buford where the PCB oil came from. He said it was found on the dock of a building in a remote section of the facility. He said there were no PCB transformers or other equipment at the building, where the oil could have come from. Mr. Buford said they believed someone abandoned the drum at their dock. All drums were marked M<sub>L</sub> and dated.

Mr. Buford called Mr. Donald Hagar, Electrical Foreman, to let us in the substations. Mr. Hagar said he could not meet with us until about 9:00 a.m. the next morning. Mr. Buford and I returned to his office to review the records.

PCB INSPECTION REPORT  
MCDONNELL DOUGLAS AEROSPACE  
ST. LOUIS, MISSOURI  
MAY 12, 1997  
PAGE 3

Mr. Buford showed me the PCB annual documents for the years 1990 - 1995. The 1990 Annual Document showed no PCB transformers were removed during the year, with 23 PCB transformers in service at the end of the year (Attachment 8).

The 1991 Annual Document showed 17 PCB transformers were shipped for disposal during the year, with 7 PCB transformers in service at the end of the year (Attachment 9). With 23 PCB transformers in service at the beginning of 1991 and the removal of 17 transformers during the year, there should be 6 PCB transformers in service at the end of the year, and not 7. Manifest Nos. 02143, 02160, 02161, 02197, 02206, and 02216 showed 17 PCB transformers were shipped for disposal (Attachment 10-15). All of the PCB transformers were disposed at ENSCO, White Bluff, Tennessee (Attachments 16-21).

Manifest No. 02197 showed four PCB transformers were shipped to ENSCO on July 23, 1991 (Attachment 13). The continuation sheet for Manifest No. 02197 showed transformer SN 6147465 as a PCB transformer. The list of PCB and PCB-contaminated transformers included with the 1991 Annual Document, did not include a transformer with SN 6147465 (Attachment 22). Two transformers known to be PCB-contaminated had serial numbers 6147466 and 6147467 and contained PCBs at concentrations of 129.3 and 92.5 ppm respectively (Attachments 23 and 24). This error was not found until I had returned to my office. I called Mr. Buford and explained the situation to him (Attachment 25). He said transformer SN 6147465 was on their untested transformer list. I asked him to try to find out if the transformer had been sampled. I told him if the PCB concentration was 500 ppm or greater, he would have to amend any annual documents affected by the transformer.

No PCB transformers were shipped for disposal during 1992 (Attachment 26).

The 1993 Annual Document showed two PCB transformers were removed during the year, leaving five PCB transformers in service at the end of the year (Attachment 27). Manifest No. GD75M showed two PCB transformers were shipped to Aptus on February 9, 1993 (Attachment 28). A certificate of destruction for Manifest No. GD75M could not be found.

The 1994 Annual Document showed six PCB transformers were shipped for disposal, leaving one in service at the end of the year (Attachment 29). The list of PCB transformers shipped during the year included two transformers shipped in February 1993. These two transformers should not have been added to the list of PCB transformers removed in 1994.

Manifest No. 02794 showed three PCB transformers were shipped to Aptus on August 19, 1994 (Attachment 30). The continuation sheet showed the serial numbers of the transformers shipped. Two of the transformers, SNs 6147466 and 6147467, were PCB-contaminated according to their analysis reports referenced earlier (Attachments 23 and 24). The CD for Manifest No. 02794 showed the PCB transformer and two PCB-contaminated transformers were disposed as of September 20, 1994 (Attachment 31).

Manifest No. 00963 showed three PCB transformers were shipped to Tipton Environmental Technology (TET) on December 26, 1994 (Attachment 32). The drained transformers were shipped from TET to U.S. Ecology in Beaty, Nevada, on Manifest No. 95006 and disposed as of January 17,

PCB INSPECTION REPORT  
MCDONNELL DOUGLAS AEROSPACE  
ST. LOUIS, MISSOURI  
MAY 12, 1997  
PAGE 4

1995 (Attachments 33 and 34). The oil from the PCB transformers was shipped to Rollins Environmental Services, Inc., Deer Park, Texas on Manifest No. 95002 and disposed as of January 10, 1995 (Attachments 35 and 36).

The 1994 Annual Document showed no PCB transformers were removed from service for disposal during the year (Attachment 37). The only PCB containing items removed for disposal were PCB-contaminated transformers and light ballasts.

It was late in the day, so I told Mr. Buford I would return at about 8:00 a.m., the next morning.

On May 13, 1997, at about 8:00 a.m., I returned to MDA to review the remaining records and inspect the substations where PCB or PCB-contaminated transformers were in service.

I asked to review the PCB storage area inspection reports. The PCB storage area was inspected monthly and Attachment 38 is a representative example.

Review of the quarterly inspection reports of the PCB and PCB-contaminated transformers showed that the same transformers were leaking in the same locations on almost every inspection (Attachments 39-41). Review of the inspection reports I collected revealed I failed to get the complete transformer inspection report for the first quarter of 1991. I called Mr. Buford and asked him to fax me a copy of the PCB-contaminated and potentially PCB-contaminated transformer inspection report for the first quarter of 1991 and a list showing MDA's transformer numbers with the corresponding manufacturer's serial numbers (Attachment 42&43).

The table below depicts transformers inspected in 1991 were still leaking in the same locations in 1993, and in one case in 1997.

DATE INSPECTED	LEAKING TRANSFORMER'S SN	PCB CLASSIFICATION	WHERE LEAKING	WHEN CLEANED
3/18/91	ULP-1	PCB	Bottom of L.V. connection box & concrete pad.	3/22/91
3/18/91	29314	PCB	Bottom of tapchanger.	3/22/91
3/19/91	6993933	PCB-CONT.	L.V. cables, connection box, & concrete pad.	3/22/91
3/19/91	2694937	PCB-CONT.	Bottom of fins & concrete pad.	3/22/97

PCB INSPECTION REPORT  
MCDONNELL DOUGLAS AEROSPACE  
ST. LOUIS, MISSOURI  
MAY 12, 1997  
PAGE 5

DATE INSPECTED	LEAKING TRANSFORMER'S SN	PCB CLASSIFICATION	WHERE LEAKING	WHEN CLEANED
6/14/93	ULP-1	PCB	Bottom of L.V. connection box & concrete pad.	6/15/93
6/14/93	29314	PCB	Bottom of tapchanger.	6/15/93
6/14/93	6993933	PCB-CONT.	Bottom of L.V. connection box & concrete pad.	6/15/93
6/14/93	2694937	PCB-CONT.	Bottom of fins & concrete pad.	6/15/93
6/14/93	2094974	PCB-CONT.	Bottom of drain cock & concrete pad.	6/15/93
3/17/97	6993933	PCB-CONT.	L.V. connection box, bottom of drain cock, & concrete pad.	3/19/97

I told Mr. Buford that leaking PCB and PCB-contaminated transformers were supposed to be repaired and cleaned or replaced, not just cleaned. He said they started inspecting the transformers weekly about two years ago, but only record the inspections quarterly. He said any time a transformer was leaking oil onto the ground they cleaned the transformer and ground.

We proceeded to Building 5 where the only remaining PCB transformer was in service. It was marked M<sub>L</sub> and was not leaking (Photo 6).

We proceeded to Building 6 where three untested transformers were located. One transformer was leaking around the lid and another transformer was leaking around the bushings (Photos 7 and 8).

We went to Substation 8 where we met Mr. Don Hagar, Electrical Foreman. All of the untested and PCB-contaminated transformers in the substation were marked with M<sub>L</sub> labels smaller than 6" by 6". I told them that only transformers with 500 ppm PCBs or greater were required to have M<sub>L</sub> labels.

Pennsylvania transformer, SN 2689-1, was leaking around the bushings, fins, and concrete pad below the fins (Photo 9). Mr. Hagar said the transformer was untested.

Wagner transformer, SN 9U1235, a 3,000-KVA unit with 975 gallons of 7N oil was leaking around the L.V. connection box onto the ground below and around the drain valve (Photos 10-12). There was an absorbent pad below the drain valve. According to the transformer inspection report for the first quarter of 1997, Wagner transformer, SN9U1235 (shown as 008HVT3 on the report) was leaking around the L.V. connection box, the drain valve, and onto the concrete pad below the drain valve (Attachment 41).

Maloney transformer, SN2120050, a 3,000 KVA unit with 760 gallons of M-3 oil, was leaking around the tapchanger and drain valve (Photos 13 and 14). The transformer had a MDA property tag with the number 008HVT4. The first quarter of 1997 transformer inspection report showed the transformer was not leaking at the time of the inspection (Attachment 41).

Kuhlman Electric transformer, SN04729, a 200 KVA unit, was leaking around the oil level gauge and bushings (Photo 15). I told Messrs. Buford and Hagar that any visible oil on the surface of a transformer was considered a leak and was to be cleaned and repaired within 48 hours. I told them they had to initiate the cleaning and repair of the transformers within 48 hours, because I knew they could not schedule the shutdown of the transformers in that time frame. Mr. Hagar said all of the transformers in Substation 8 were scheduled for retrofill in early summer. He said they initially planned to retrofill or replace the transformers a few years ago, but an expansion of the St. Louis Airport put that project on hold. Mr. Hagar said the airport project was still several years away, so they decided they needed to retrofill the transformers. There were 15 oil circuit breakers (OCBs) in the substation and all of them were leaking. Mr. Hagar said the oil was last changed in the OCBs about five years ago.

We proceeded to Substation 20. There were four PCB-contaminated transformers inside the substation. Mr. Hagar said they were retrofilled in January by S.D. Myers and the 90 day resampling was conducted by S.D. Myers on May 12, 1997.

Wagner transformer, SN9V1328, a 5,000 KVA unit with 1075 gallons of 7N oil, had a stain on the concrete pad below the drain valve (Photos 16 and 17). The drain valve did not have any visible oil stains. Mr. Buford said they have cleaned the stain at least quarterly with hexane, but the stain could not be removed. He said they took wipe samples after the stain was cleaned, and, if the analysis was 10mg/100cm<sup>2</sup> or less, no further cleaning was performed. I suggested they try using kerosene, since it did not evaporate as rapidly as hexane.

We returned to Mr. Buford's office. Mr. Buford was able to find a possible PCB analysis report for the leaking Pennsylvania transformer, SN2689-1. The analysis report was dated June 10, 1983, and had three sample results. Sample No. 1 showed it contained 500ppm PCBs and sample Nos. 2 and 3 were less than 1ppm (Attachment 44). The sample description for Sample No. 1 indicated it was transformer oil from Substation 8. A hand written number above the description of Sample No. 1 was 2689-1. Since there were no other records to show that the analysis report was for transformer, SN2689-1, I suggested they retest the transformer and send me a copy of the analysis report.

An analysis report for transformer, SN4014-1, showed it contained 13ppm PCBs (Attachment 45). The transformer was shown as untested in the transformer list.


## CLOSING CONFERENCE

The following people were present for the closing discussion: Mr. Bryan Kury, Manager, Environmental & Hazardous Materials Services; Mr. Joseph Haake, Group manager, and Mr. Gary Buford, Environmental Specialist. Mr. Buford signed and received copies of the Receipt for


PCB INSPECTION REPORT  
MCDONNELL DOUGLAS AEROSPACE  
ST. LOUIS, MISSOURI  
MAY 12, 1997  
PAGE 7

Samples, Declaration of CBI, and Summary of Observations. I went over the possible deviations from PCB regulations observed during the inspection. I told them no additional action was required on the one year exception report. I told them they had to amend the 1994 Annual Document. I also told them they had to initiate the cleaning and repairing of the leaking transformers in Substation 8 and Building 6.

**SUBMITTED BY:**

  
Robert L. Krager  
Environmental Specialist  
Enforcement Section  
Hazardous Waste Program  
May 21, 1997

**APPROVED BY:**

  
David J. Giarratano, Chief  
Special Facilities Unit  
Enforcement Section  
Hazardous Waste Program

RLK:rt

**ATTACHMENTS**

1. One Year Exception Report
2. Notice of Inspection
3. Receipt for Samples
4. Summary of Observations
5. Confidentiality Notice
6. Declaration of CBI
7. Map of Facility
8. 1990 Annual Document
9. 1991 Annual Document
10. Manifest No. 02143
11. Manifest No. 02160
12. Manifest No. 02161
13. Manifest No. 02197
14. Manifest No. 02206
15. Manifest No. 02216
16. CD for Manifest No. 02143
17. CD for Manifest No. 02160
18. CD for Manifest No. 02161
19. CD for Manifest No. 02197
20. CD for Manifest No. 02206
21. CD for Manifest No. 02216
22. List of transformers
23. Analysis Report for Transformer SN 6147466

**PCB INSPECTION REPORT  
MCDONNELL DOUGLAS AEROSPACE  
ST. LOUIS, MISSOURI  
MAY 12, 1997  
PAGE 8**

24. Analysis Report for Transformer SN 6147467
25. TCR dated 5/15/97
26. 1992 Annual Document
27. 1993 Annual Document
28. Manifest No. GD75M
29. 1994 Annual Document
30. Manifest No. 02794
31. CD for Manifest No. 02794
32. Manifest No. 00963
33. Manifest No. 95006
34. CD for Manifest No. 95006
35. Manifest No. 95002
36. CD for Manifest No. 95002
37. 1995 Annual Document
38. PCB Storage Area Inspection Report dated May 7, 1996
39. Quarterly Inspection Report for 1st Quarter 1991
40. Quarterly Inspection Report for 2nd Quarter 1993
41. Quarterly Inspection Report for 1st Quarter 1997
42. TCR dated 5/20/97
43. Fax Correlating Transformer Numbers
44. Analysis report for Transformer SN 2689-1
45. Analysis report for Transformer SN 4014-1
46. Photographs
47. FTTS

**MCDONNELL DOUGLAS**

McDonnell Douglas Aerospace

June 10, 1996

Regional Administrator, Region VII  
U.S. Environmental Protection Agency  
726 Minnesota Avenue  
Kansas City, Kansas 66101

RE: ONE-YEAR EXCEPTION REPORT

**RECEIVED**

JUN 13 1996

**TOXIC SUBSTANCES PREVENTION  
& PLANNING BRANCH (TSPP)**

Dear Sir:

In reference to 40 CFR 761.215, McDonnell Douglas Aerospace is hereby submitting an exception report concerning the following PCB contaminated waste that was destroyed after one year from the date removed from service for disposal.

Date removed from service for disposal :	3/02/95
Date received at disposal facility:	2/09/96
Date transported to another disposal facility:	N/A
Generator name:	McDonnell Douglas Aerospace
Generator EPA ID. number:	MOD000818963
Transporter 1:	Rollins Chem Pak, Inc.
Transporter 1 EPA ID number:	DED982565947
Transporter 2:	Safeway Chemical Transportation
Transporter 2 EPA ID number:	DER 0000000273
Transporter 3:	Allworth of Tennessee, Inc.
Transporter 3 EPA ID number:	IND981970119
Transporter 4:	Matlack Inc.
Transporter 4 EPA ID number:	DED981110166
Disposer:	Rollins Environmental Services (Tx)
Disposer EPA ID number:	TXDO55141378
Destruction Date:	04/10/96

Reason waste was not disposed of within one year: MDA began using this drum as an accumulation container on 3/02/95 for collection of small quantities of samples and transformer oil. This drum and 4 other drums (October 95 removed from service dates) were removed from the MDA facility on 1/30/96. Prior to the transportation of these drums, Rollins Environmental Services indicated this drum would be destroyed within the required period of time. MDA's first knowledge of the missed destruction date was the receipt of the destruction certificates. MDA received the destruction certificates May 15, 1996 and a copy of the exception report May 28, 1996.

Please contact Gary Buford at (314) 234-8171 if you have any questions or if you need additional information.

Sincerely,



Robert H. Kaatman, Manager  
Environmental and Hazardous Material Services  
Dept. 464C, Bldg. 110, Mailcode 1111099  
(314) 232-3319

P.O. Box 516, Saint Louis, MO 63166-0516 (314) 232-0232 TELEX 44-857

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JUN 20 1996

**HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES**

Attachment 1

RLNs TX had initial 4-29-96 (at least) to learn





2-22-96

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09/30/94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M 0 0 0 0 0 8 1 8 9 6 3 0 3 0 9	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address McDonnell Douglas Corporation, Mailcode 1111099 Lindbergh & McDonnell Blvd., Hazelwood, MO 63042				A. State Manifest Document Number: 00704605		
4. Generator's Phone (314) 232-3319		6. US EPA ID Number D E D 9 8 2 5 6 5 9 4 7		B. State Generator's ID 001001 Same 99929		
5. Transporter 1 Company Name Rollins Chempak, Inc.		8. US EPA ID Number S A F E W A Y C H E M I C A L T R A D E I N D E A 0 0 0 0 0 0 2 7 3		C. State Transporter's ID H-1666/81889		
7. Transporter 2 Company Name SAFEWAY CHEMICAL TRADING		10. US EPA ID Number T X D 0 5 5 1 4 1 3 7 8		D. Transporter's Phone (302) 479-2955		
9. Designated Facility Name and Site Address Rollins Environmental Services (TX), Inc. P.O.Box 609, 2027 Battleground Rd. Deer Park, TX 77536				E. State Transporter's ID H-2126/80054		
				F. Transporter's Phone 800 433 8470		
				G. State Facility's ID INTX16 TXD055141378		
				H. Facility's Phone (713) 930-2300		
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
X	a. RQ, Polychlorinated biphenyls, mixture (Liquid) 9, UN2315, PGIII <del>NON-FLAMMABLE LIQUID</del>	005	DM	009/18	kg	OUTS 2981 MU04 N666
	b.					
	c.					
	d.					
J. Additional Descriptions for Materials Listed Above a. PCB Oil/Water HO-46988-566565		VEH LIC# MO26286		K. Handling Codes for Wastes Listed Above 11a) Sol TD Mall ✓		
15. Special Handling Instructions and Additional Information "If unable to deliver to designated TSD facility, return to generator." Emergency contact: (314) 232-2285 PCB MANIFEST						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name GARY BUFORD		Signature Gary Buford		Month Day Year 01/30/96		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name John F Coyne		Signature John F Coyne		Month Day Year 01/30/96		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name MARK HUFFMAN		Signature Mark Huffman		Month Day Year 02/02/96		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Edward A. Stehley		Signature Edward A. Stehley		Date 02/09/96		

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. 0110000001763		Manifest Document No. 03045		22. Page 2 of 3		Information in the shaded areas is not required by Federal law.		
23. Generator's Name MCDONNELL DODGLES Same						L. State Manifest Document Number 00704605				
24. Transporter All South 2 Tennessee TN Company Name						M. State Generator's ID 001001 Same 99929				
25. US EPA ID Number 17A10971770101						N. State Transporter's ID 87747				
26. Transporter 4 Company Name MOTELLY INC						O. Transporter's Phone 615/377-7001				
27. US EPA ID Number ID 579511 01/01/92						P. State Transporter's ID 40310				
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						29. Containers No. Type		30. Total Quantity	31. Unit Wt./Vol	R. Waste No.
a.										
b.										
c.										
d.									3	
e.										
f.										
g.										
h.										
i.										
S. Additional Descriptions for Materials Listed Above						T. Handling Codes for Wastes Listed Above				
32. Special Handling Instructions and Additional Information										
33. Transporter 5 Acknowledgement of Receipt of Materials										
Printed/Typed Name Kandy Tronier					Signature Kandy Tronier			Date 02/05/95		
34. Transporter 4 Acknowledgement of Receipt of Materials										
Printed/Typed Name G. J. Jenkins					Signature G. J. Jenkins			Date 02/07/95		
35. Discrepancy Indication Space										

01/30/96

MANIFEST NUMBER : 00704605 (KLM)  
PCB SHIPMENT MANIFEST CONTINUATION SHEET  
MCDONNELL DOUGLAS AEROSPACE  
P.O. BOX 516, ST. LOUIS, MISSOURI 63166

Generator Unique ID	Description	Date Removed	Storage Date	Weight (KG)
9431	Oil Contaminated with PCB	03/02/95	03/02/95	220
9532	Oil Contaminated with PCB	10/18/95	10/20/95	170
9533	Oil Contaminated wiyh PCB	10/18/95	10/20/95	132
9534	Oil Contaminated with PCB	10/18/95	10/20/95	198
9535	Oil Contaminated with PCB	10/18/95	10/20/95	198
TOTAL (KG)				918

Att 1 pg 4

ID: PTR1722C  
DATE : 5/10/96  
TIME : 2:01 PM

ROLLINS ENVIRONMENTAL SERVICES (TX) INC  
CERTIFICATE OF DISPOSAL

PAGE: 1

\*\*\*\*\*  
Certificate of Disposal      Stream      Order      Manifest      Received      Final  
Name and Address      Number      Number      Number      Date      Disposal  
\*\*\*\*\*  
046988      187541      TX00704605      02/09/96      05/09/96

MCDONNELL DOUGLAS CORPORATION  
MAILCODE 1111099  
LINDBERGH & MCDONNELL  
HAZELWOOD      MO 63042  
Attn: GARY BUFORD

-----  
Inventory      Customer's Unique      ----- CONTAINER -----      Prod SHP      Disposal  
Cntrl Nbr      Serial Number      Type      Contents      Code      TO Mthd      Date  
-----  
600409790      9535      55SD565      LIQUID      565      I      05/09/96  
                 Contents Only      55SD           565      I      03/31/96  
600409791      9532      55SD565      LIQUID      565      I      05/09/96  
                 Contents Only      55SD           565      I      03/31/96  
600409792      9533      55SD565      LIQUID      565      I      05/09/96  
                 Contents Only      55SD           565      I      03/31/96  
600409793      9534      55SD565      LIQUID      565      I      05/09/96  
                 Contents Only      55SD           565      I      03/31/96  
600409794      9431      55SD565      LIQUID      565      I      04/09/96  
                 Contents Only      55SD           565      I      04/10/96  
Total Containers :      5

ATH 1 pg 5

PROGRAM-ID: PTR1722C      ROLLINS ENVIRONMENTAL SERVICES (TX) INC  
RUN DATE : 5/10/96      CERTIFICATE OF DISPOSAL  
RUN TIME : 2:01 PM

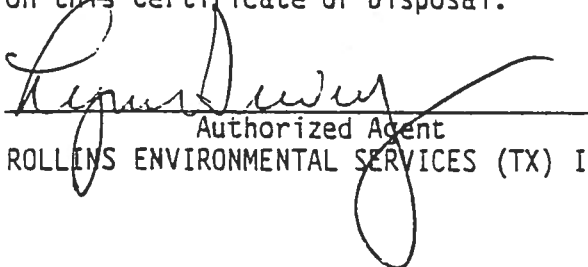
PAGE: 2

\*\*\*\*\*  
This completes the Certificates of Destruction per Manifest Number TX00704605.

\*\*\*\*\*  
\* Disposal Methods : \*  
\* 'I' - Waste that was incinerated. \*  
\* 'L' - Waste that was landfilled. \*  
\* Disposal Facility : ROLLINS ENVIRONMENTAL SERVICES (TX) INC \*  
\* PO BOX 609 \*  
\* DEER PARK TX 77536 \*  
\* EPA ID: TXD055141378 \*  
\* \*  
\*\*\*\*\*

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

  
\_\_\_\_\_  
Authorized Agent  
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

AH 1 pg 6



United States Environmental Protection Agency  
Washington, D.C. 20460  
Toxic Substances Control Act  
NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Approval Expires 10-31-92

07-97-T-229

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date	Inspector No.	Daily Seq. No.		
05/12/97	MOOST	61	1:15 pm	McDonnell Douglas
4. Inspector Address			5. Firm Address	
MDNR/HWP P.O. Box 176 Jefferson City, MD 65108			Lindbergh & McDonnell Blvd. Hazelwood, MD 63042	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

- |  |  |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data     | <input type="checkbox"/> E. Research data  |
| <input type="checkbox"/> C. Pricing data   |  |

The nature and extent of inspection of such data specified in A through E above is as follows:

<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
Inspector Signature <i>Robert L. Krager</i>		Recipient Signature <i>David Shanks</i>	
Name Robert L. Krager		Name David Shanks	
Title Env. Spec.	Date Signed 05/12/97	Title Principal Env. Spec.	Date Signed 05/12/97



United States Environmental Protection Agency  
Washington, D.C. 20460  
Toxic Substances Control Act  
RECEIPT FOR SAMPLES AND DOCUMENTS

1. Investigation Identification			2. Firm Name
Date 05/12/97	Inspector No. MOBIT	Daily Seq. No. 01	McDonnell Douglas
3. Inspector Address INDNR/HWP P.O. Box 176 Jefferson City, MO 65102			4. Firm Address Lindbergh & McDonnell Blvd Hazelwood, MO 63042

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
	1990 - 1995 Annual Report Summaries Manifest No. 00963 CD for Manifest No. 95004 Manifest No. 95006 & CD Manifest No. 95003 & CD CD for Manifest No. K512M Manifest No. 02794 Manifest No. 0075M Manifest No. 02143 & CD Manifest No. 02160 & CD Manifest No. 03161 & CD Manifest No. 02197 & CD Manifest No. 02206 & CD Manifest No. 02216 & CD P&B storage area inspection report 5/7/96 1st Quarter 1991 Transformer insp. report 2nd Quarter 1993 Transformer insp. report 1st Quarter 1997 Transformer insp. report Photographs Analysis result dated 7/13/83 Analysis result dated 01/10/93 Analysis results for Transformers SIVs 6147466 & 6147467

Optional:

Duplicate or split samples: Requested and Provided ☐ Not Requested ☐

Inspector Signature Robert H. Krager		Recipient Signature X Gary Buford	
Name Robert H. Krager		Name Gary Buford	
Title Env. Spec.	Date Signed 05/13/97	Title Env. Specialist	Date Signed 05/13/97

U ENVIRONMENTAL PROTECTION AGENCY  
TSCA INSPECTION  
SUMMARY OF OBSERVATIONS

07-97-T-229

Name and Address of Inspector(s) <b>Robert L. Krager</b> Environmental Protection Agency Toxics and Pesticides Branch 726 Minnesota Avenue Kansas City, Kansas 66101		Name and Address of Facility <b>McDonnell Douglas</b> <b>Lindbergh &amp; McDonnell Blvd.</b> <b>Hazelwood, MO 63042</b> Chief Executive Officer of Firm <b>Harry Stonciepler</b>	
Name of Individual to Whom Notice Given <b>Gary Buford</b>		Title <b>CEO</b>	
Title	Date	Address	
<b>Env. Spec.</b>	<b>05/13/97</b>	<b>ST. Louis, MO 63166-0516</b>	

The following possible deviations from the requirements of the Toxic Substances Control Act and regulations promulgated thereto were observed during this inspection:

1. Failure to dispose of one drum of PCB oil (Drum No. 9431) within the required one year time frame.
2. Failure to provide accurate annual document for 1994.
3. Improper disposal due to two untested transformers leaking oil from the lid and/or bushings at Bldg 6 <sup>PCB-cont.</sup>
4. Improper disposal due to <sup>PCB-cont.</sup> Wagner SN 941235 leaking around bushings, tapchanger & drain valve.
5. Improper disposal due to <sup>PCB-cont.</sup> Moloney SN 2126050 level valve & tap changer
6. Improper disposal due to ~~an~~ untested Pennsylvania transformer SN-2689-1 leaking.

This Summary of Observations is provided to bring to your attention those areas of concern at the earliest possible time. It is not intended to be a complete list of deviations from the requirements of the Toxic Substances Control Act and regulations thereto, but rather a list of those conditions of immediate concern and/or those readily apparent. If you have any questions regarding this summary, please contact the Toxics and Pesticides Branch at 913/551-7020..

The undersigned acknowledges having received and read a copy of this TSCA Summary of Observations.

<b>X</b> <b>Jamy Buford</b>	<b>Env. Spec.</b>	<b>05/13/97</b>
Signature	Title	Date
<b>Robert H. Krager</b>	<b>Env. Spec.</b>	<b>05/13/97</b>
Signature of Inspector	Title of Inspector	Date

Distribution: White - Regional Office Copy  
Yellow - Facility Copy  
Pink - Inspector's Copy





U.S. ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

01-97-T-229

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 05/12/97	INSPECTOR NO. MOOIT	DAILY SEQ. NO. 61	McDonnell Douglas
3. INSPECTOR NAME Robert L. Krager			4. FIRM ADDRESS Lindbergh & McDonnell Blvd. Hazelwood, MO 63042
5. INSPECTOR ADDRESS MONR/HWP P.O. Box 176 Jefferson City, MO 65102			6. CHIEF EXECUTIVE OFFICER NAME Harry Stone-Cipher
			7. TITLE CEO

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

FOIA Officer - EPA Region VII  
726 Minnesota Ave.  
Kansas City, KS 66101

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE David Shanks		NAME	
NAME David Shanks		TITLE	
TITLE Prin. Env. Spec.	DATE SIGNED 05/12/97	ADDRESS	



United States Environmental Protection Agency  
Washington, D.C. 20460

Toxic Substances Control Act

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

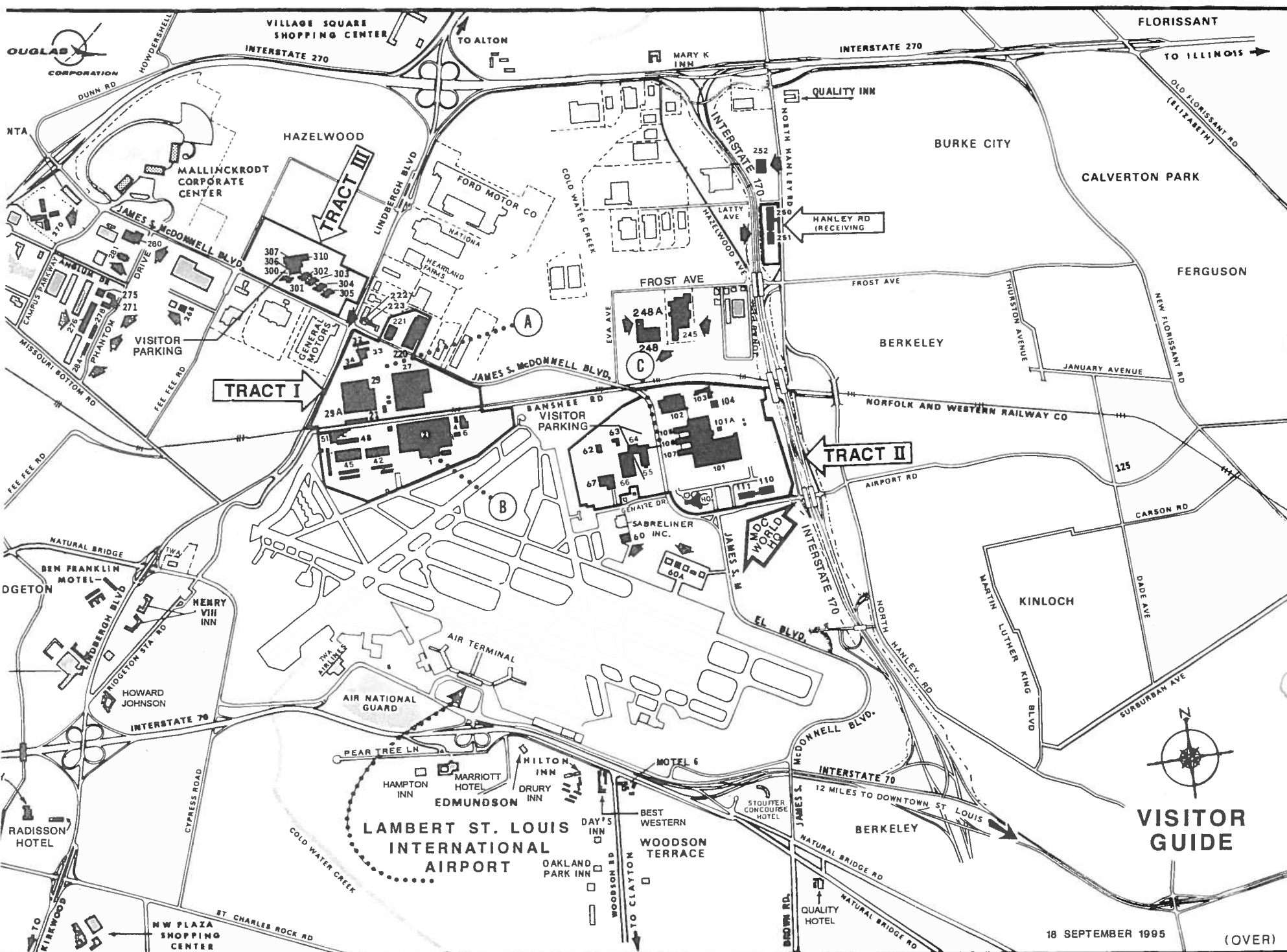
07-97-T-229

1. Investigation Identification			2. Firm Name
Date 05/12/97	Inspector No. 10001T	Daily Seq. No. 01	McDonnell Douglas
3. Inspector Address MDIA/HWA P.O. Box 176 Jefferson City, MO 65102			4. Firm Address Lindbergh + McDonnell Blvd. Hazelwood, MO 63042

Information designated as confidential business information

No.	Description
	None Declared

Inspector Signature Robert L. Kragar		Claimant Signature x Gary Buford	
Name Robert L. Kragar		Name Gary Buford	
Title Env. Spec.	Date Signed 05/13/97	Title Env. Spec.	Date Signed 05/13/97



**VISITOR  
GUIDE**

# Annual PCB Report Document

McDonnell Aircraft Company - St. Louis

For the Reporting Period  
04 February 1990 - 31 December 1990

Environmental Compliance  
Dept. 064C  
19 June 1991

*Attachment 8*

40 CFR 761.180 (a) (1)

Quantities of PCBs and PCB Items Removed From Service and Placed  
Into Storage for Disposal during 04 FEB 1990 to 31 December 1990

---

(i) Total weight of PCBs and PCB Items in Containers: 12646 kg.

Liquids:.....4640 kg.  
Capacitors: .....0 kg.  
PCB Contaminated Material: .....530 kg.  
Non-regulated Ballasts: .....7476 kg.

(ii) Total number of PCB Transformers: ..... 0  
Total weight of PCBs contained in the transformers: ..0 kg.

(iii) Total number of PCB Large Capacitors  
(not in containers listed above): .....0

A printout is attached that contains information on each individual  
container, transformer and large capacitor.

40 CFR 761.180 (a) (3)

PCB and PCB Items in Service at the end of this reporting period:

---

- (i) Total weight of PCBs and PCB Items in containers: .....NONE
- (ii) Total number of PCB Transformers (>500 ppm): .....23  
Total weight of PCBs in these transformers: .....47679 kg.
- (iii) Total number of PCB Large Capacitors: .....0

The attached printout provides a detailed listing of the in-service PCB items.

# PCB ANNUAL REPORT DOCUMENT

**McDonnell Aircraft Company - St. Louis**

**For the Reporting Period**

**01 January 1991 - 31 December 1991**

Environmental Compliance

Dept.064 c

17 June 1992

*Attachment 9*

**40 CFR 761.180 (a) (1)**

Quantities of PCBs and PCB Items Removed From Service and Placed  
Into Storage for Disposal during 01 JAN 1991 to 31 Dec 1991

---

(i) Total weight of PCBs and PCB Items in Containers: 16503 kg.

Liquids:.....2444 kg.  
Capacitors:.....0 kg.  
PCB Contaminated Material:.....108 kg.  
Non-regulated Ballasts:.....13951 kg.

(ii) Total number of PCB Transformers:.....17  
Total weight of PCBs contained in the transformers: 142610 kg.

(iii) Total number of PCB Large Capacitors  
(not in containers listed above): .....0

A printout is attached that contains information on each individual  
container, transformer and large capacitor.

AT 9 pg 2



**40 CFR 761.180 (a) (3)**

PCB and PCB Items in Service at the end of this reporting period:

---

- (i) Total weight of PCBs and PCB Items in containers: .....NONE
- (ii) Total number of PCB Transformers (>500 ppm): .....7  
Total weight of PCBs in these transformers: .....22085 kg
- (iii) Total number of PCB Large Capacitors: .....0

The attached printout provides a detailed listing of the in-service PCB items.

## PCB TRANSFORMERS

ID NUMBER	LOCATION	GALLONS	WEIGHT (KG)	REMOVED FROM SERVICE	TRANS- PORTED	DESTROYE
6622465	BLDG 005: EAST OF BOILER HOU	385	2250	/ /	/ /	/ /
6335506	BLDG 042: ROOM 110 (P-13)	415	2410	/ /	/ /	/ /
5699110	BLDG 042: ROOM 110 (L-8)	280	1638	/ /	/ /	/ /
ULP-1	BLDG 043: SS OF BLDG	680	4168	/ /	/ /	/ /
9M2588	BLDG 102: COL 11A	750	4410	/ /	/ /	/ /
29314	BLDG 103: COMPRESSOR ROOM	676	3960	/ /	/ /	/ /
9315	BLDG 103: COMPRESSOR ROOM	556	3249	/ /	/ /	/ /
		0	0	/ /	/ /	/ /
*** Total ***		3742	22085			

Att 9 p 4

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No M O D 0 9 5 8 1 8 9 6 3 0 2 1 4 3		Manifest Document No.		2. Page 1 1 of 2		Information in the shaded areas is not required by Federal law.						
3. Generator's Name and Mailing Address McDonnell Douglas P.O. Box 516 St. Louis, MO 63166						A. State Manifest Document Number 01001-02143								
4. Generator's Phone (314) 232-2319						B. State Generator's ID 01001								
5. Transporter 1 Company Name Hazmat Trucking						6. US EPA ID Number N Y D 9 8 0 7 6 9 9 4 7		C. State Transporter's ID H 1504						
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 716-877-5533						
9. Designated Facility Name and Site Address ENSCO AlW Industrial Dr. White Bluff, TN. 37187						10. US EPA ID Number T N D 9 8 0 7 2 9 3 0 5		E. State Transporter's ID						
								F. Transporter's Phone						
								G. State Facility's ID						
								H. Facility's Phone (615) 797-9067						
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.		
a. <input checked="" type="checkbox"/> Hazardous substance, liquid N.O.S. ORM-E NA 9188 (Polychlorinated Biphenyls) RQ 10/4.5						0 0 1 C Y		4 7 6 7		KG		10,487 PCB		
b. <input checked="" type="checkbox"/> Hazardous substance, liquid N.O.S. ORM-E NA 9188 (Polychlorinated Biphenyls) RQ 10/4.5						0 0 1 C Y		1 9 3		KG		425 PCB		
c.														
d.														
J. Additional Descriptions for Materials Listed Above 11a. PCB Transformer (see attached) 11b. Gas absorber box (see attached) LOAD# 64574 Emergency Contact: 314-232-2285						K. Handling Codes for Wastes Listed Above								
15. Special Handling Instructions and Additional Information Dike and contain spills, avoid skin contact, alternate TSD-return to generator. Emergency Response Guide 31														
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.														
Printed/Typed Name V A Sherrill					Signature V A Sherrill					Month Day Year 04/13/91				
17. Transporter 1 Acknowledgement of Receipt of Materials										Month Day Year 04/13/91				
Printed/Typed Name Hager Bowling					Signature Hager Bowling					Month Day Year 04/13/91				
18. Transporter 2 Acknowledgement of Receipt of Materials										Month Day Year				
Printed/Typed Name					Signature					Month Day Year				
19. Discrepancy Indication Space Corrections made per letter 4/16-91														
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.														
Printed/Typed Name Joe Bell					Signature Joe Bell					Month Day Year 04/13/91				

Attachment 10

## Manifest Additional Description Continuation Sheet

Generator McDonnell Douglas

Manifest #. 02143 Pg 2 of 2

[illegible]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1		Information in the shaded areas is not required by Federal law.						
		M D 00081896		302160		1 of 2								
3. Generator's Name and Mailing Address McDonnell Douglas P.O. Box 516 St. Louis, MO. 63166						A. State Manifest Document Number 01001-2160								
4. Generator's Phone (314) 232-2319						B. State Generator's ID 01001								
5. Transporter 1 Company Name Tri-State Motor Transit						C. State Transporter's ID 1513-999								
6. US EPA ID Number MOD 095038998						D. Transporter's Phone 417-624-3131								
7. Transporter 2 Company Name						E. State Transporter's ID H-1144								
8. US EPA ID Number						F. Transporter's Phone								
9. Designated Facility Name and Site Address ENSCO AlW Facility Industrial Drive White Bluff, TN 37187						G. State Facility's ID								
10. US EPA ID Number TND 980729305						H. Facility's Phone (615) 797-9067								
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.		
a. X Hazardous Substance, Solid, N.O.S. ORM-B NA 9188, (Polychlorinated Biphenyls) RQ 10/4.5						No. Type 1-3 CY		14522		KG		PCB		
b.														
c.														
d.														
J. Additional Descriptions for Materials Listed Above 11a. PCB Transformers: See attached LOAD# 65040						K. Handling Codes for Wastes Listed Above								
15. Special Handling Instructions and Additional Information Dike and contain spills, avoid skin contact, alternate TSD-return to generator. Emergency Response Guide 31. Emergency contact # (314) 232-2285														
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.														
Printed/Typed Name VA Sherrill					Signature A Sherrill					Month Day Year 05/13/91				
17. Transporter 1 Acknowledgement of Receipt of Materials														
Printed/Typed Name OTIS E. CAMP					Signature Otis E. Camp					Month Day Year 05/13/91				
18. Transporter 2 Acknowledgement of Receipt of Materials														
Printed/Typed Name					Signature					Month Day Year				
19. Discrepancy Indication Space Corrections made per letter 5-16-91														
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.														
Printed/Typed Name ALLEN TAYLOR					Signature Allen Taylor					Month Day Year 05/16/91				

Attachment 11

Manifest Additional Description Continuation Sheet

Generator McDonnell Douglas Manifest # 02160 Pg 2 of 2

[illegible]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M 0 0 0 0 0 8 1 8 9 6 3 0 2 1 1 6 1	Manifest Document No. 1 of 2	2. Page 1 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address McDonnell Douglas P.O. Box 516 St. Louis, MO. 63166 (314) 232-3319			A. State Manifest Document Number 01001-2161			
4. Generator's Phone (314) 232-3319			B. State Generator's ID 01001			
5. Transporter 1 Company Name Tri-State Motor Transit			6. US EPA ID Number M 0 0 0 9 5 0 3 8 9 9 8		C. State Transporter's ID 1513-999	
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 417-624-3131	
9. Designated Facility Name and Site Address ENSCO AlW Facility Industrial Drive White Bluff, TN 37187			10. US EPA ID Number T N D 9 8 0 7 2 9 3 0 5		E. State Transporter's ID 11144	
					F. Transporter's Phone	
					G. State Facility's ID	
					H. Facility's Phone (615) 797-9067	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Hazardous Substance, Solid, N.O.S. ORM-E NA 9188, (Polychlorinated Biphenyls) RQ 10/4.5	1-2 CY	1119310	KG	PCB
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11a. PCB Transformers: See Attached  LOAD# 65041			K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Dike and contain spills, avoid skin contact, alternate TSD-return to generator. Emergency Response Guide 31. Emergency Contact #314-232-2285						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name VICTORIA SHEPHERD			Signature Victoria Sheperd		Month Day Year 10/5/14/9/1	
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name Hernandez, Marcos E.			Signature Marcos Hernandez		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name Hernandez, Marcos E.			Signature Marcos Hernandez		Month Day Year	
19. Discrepancy Indication Space  Corrections made per letter 5-5-91 JC						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name JOHN SPARKS			Signature John Sparks		Month Day Year 05/15/91	

Attachment 12

Nani fest Additional Description Continuation Sheet

Generator McDonnell Douglas Manifest # 02161 Pg 2 of 2

[illegible]



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No MO D 00 0 8 1 8 9 6 3 0 2 1 9 7		Manifest Document No.		2. Page 1 1 of 2		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address McDonnell Douglas P.O. Box 516 St. Louis, MO. 63166 (314) 232-3319						A. State Manifest Document Number 01001-2197							
4. Generator's Phone						B. State Generator's ID 01001							
5. Transporter 1 Company Name Tri-State Motor Transit						6. US EPA ID Number MO D 00 9 5 0 3 8 9 9 8		C. State Transporter's ID 1513-999					
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 417-624-3131					
9. Designated Facility Name and Site Address ENSCO AlW Facility Industrial Drive White Bluff, TN. 37187						10. US EPA ID Number TN D 9 8 0 7 2 9 3 0 5		E. State Transporter's ID H-1144					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone (615) 797-9067					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> Hazardous Substance, Liquid, N.O.S. ORM-E NA 9188, (Polychlorinated Biphenyls) RQ 10/4.5						6 0 0 4 CY		1 6 4 3 5		KG		PCB	
b. <input checked="" type="checkbox"/> Hazardous Substance, Liquid, N.O.S. ORM-E NA 9188, (Polychlorinated Biphenyls) RQ 10/4.5						4 0 0 DM		1 1 7 0		KG		PCB	
c. <input checked="" type="checkbox"/> Hazardous Substance, Solid, N.O.S. ORM-E NA 9188, (Polychlorinated Biphenyls) RQ 10/4.5						1 0 0 DM		1 1 7 0		Kg		PCB	
d.													
J. Additional Descriptions for Materials Listed Above 11a PCB Transformers: See Attached 11b PCB Liquid in drums: See Attached 11c PCB Solids in drum: See Attached LOAD# 66194 ORDER#69748						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information  Dike and contain spills, avoid skin contact, alternate TSD return to generator. Emergency Response Guide 31. Emergency Contact #314-232-2285													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name V A Sherrill						Signature V A Sherrill				Month Day Year 10/7/23/91			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name James Thompson						Signature James Thompson				Month Day Year 10/7/23/91			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name JOHN SPARKS						Signature John Sparks				Month Day Year 10/7/23/91			

Attachment 13

## Manifest Additional Description Continuation Sheet

Generator McDonnell Douglas Manifest # 02197 Pg 2 of 2

[illegible]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address McDonnell Douglas P.O. Box 516 St. Louis, MO. 63166		4. Generator's Phone ( ) (314) 232-3319		6. US EPA ID Number M O D 0 9 5 0 3 8 9 9 8		A. State Manifest Document Number 01001-02206		B. State Generator's ID 01001	
5. Transporter 1 Company Name Tri-State Motor Transit		7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 1513-999		D. Transporter's Phone 417-624-3131	
9. Designated Facility Name and Site Address ENSCO ALW Facility Industrial Drive White Bluff, TN. 37187		10. US EPA ID Number T N D 9 8 0 7 2 9 3 0 5		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. <input checked="" type="checkbox"/> X Hazardous Substance, Liquid, N.O.S. ORM-E NA9188, (Polychlorinated Biphenyls) RQ 10/4.5		4 CY		16613		KG		PCB	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above 11a PCB Transformers: See attached continuation sheet LOAD# 66440 vic 463742 Order# 36550 138005		K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information Dike and contain spills, avoid skin contact, alternate TSD-return to generator. Emergency Response Guide 31. Emergency contact#314-232-2285 Missouri Transporter ID# H-1144									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name Annette C. Wagner		Signature Annette C. Wagner		Month Day Year 10/8/1991					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Reginald E. Goshawk		Signature Reginald E. Goshawk		Month Day Year 10/8/1991			
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name JOHN SPARKS		Signature John Sparks		Month Day Year 10/8/1991					

## Manifest Additional Description Continuation Sheet

Generator McDonnell Douglas

Manifest # 02206

Pg 2 of 2

[illegible]

W10 467340 T C 331

Please print or type. (Form designed for use on a 12-pitch typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 9 5 0 3 8 9 9 8		Manifest Document No. 0 2 2 1 6		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address McDonnell Douglas P O Box 516 St. Louis, MO 63166						A. State Manifest Document Number 01001-02216			
4. Generator's Phone (314) 232-3319						B. State Generator's ID 01001			
5. Transporter 1 Company Name Tri-State Motor Transit				6. US EPA ID Number M O D 0 9 5 0 3 8 9 9 8		C. State Transporter's ID 1513-999			
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 417-624-3131			
9. Designated Facility Name and Site Address ENSCO AlW Facility Industrial Drive White Bluff, TN 37187						E. State Transporter's ID H-1144			
10. US EPA ID Number T N D 9 8 0 7 2 9 3 0 5						F. Transporter's Phone			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
a. <input checked="" type="checkbox"/> HM Hazardous Substance, Liquid N.O.S. ORM-E NA9188, (Polychlorinated Biphenyls) RQ 10/4.5						No. Type		14. Unit Wt/Vol	
b. <input checked="" type="checkbox"/> HAZARDOUS SUBSTANCE, SOLID, NO.S. ORM-E NA9188, (POLYCHLORINATED BIPHENYLS) RQ 10/4.5						- 1 3 Q Y 1 8 3 4 5		KG PCB	
c.									
d.									
J. Additional Descriptions for Materials Listed Above 11B PCB SOLIDS IN DRUM: CONTINUATION SHEET 11a. PCB Transformers; see attached continuation sheet LOAD # 66565 Order # 71436						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Dike and contain spills, avoid skin contact, alternate TSD - return to generator. Emergency Response Guid 31. Emergency contact # 314-232-2285 Missouri Transporter ID# H-1144 <del>CT# 476</del> LE# FT04521 133002									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name V A Sherrill					Signature [Signature]			Month Day Year 05/26/91	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name GARY L BBA DFO RD					Signature [Signature]			Month Day Year 05/26/91	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name					Signature			Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name JOHN SPARKS					Signature [Signature]			Month Day Year 05/27/91	

Attachment 15

## Manifest Additional Description Continuation Sheet

Generator McDonnell Douglas Manifest # 02215 Pg 2 of 2

[illegible]

**CERTIFICATION**

P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4160

**No.** 85218

## CERTIFICATION OF COMPLIANCE AND DISPOSAL

INVOICE  
NO. 63417ABB SERVICE COMPANY  
ATTN: DOMINIC POLIZZI  
4000 BILTMORE SUITE 520  
FENTON, MO 63026

JUL 16 1991

ENSOCO CERTIFIES THAT THE ITEMS ASSOCIATED BY MANIFEST MO000002143  
HAVE BEEN PROCESSED AS DESCRIBED BELOW:

IDENTIFICATION NUMBER	DESCRIPTION	DATE OF DISPOSAL	DISPOSAL PROCESS/PROCESSES
1. MO000002143	HAZ SUB LIQ NOS ORME NA9188PCB	5/26/91	LANDFILL/INCINERATION
2. MO000002143	HAZ SUB SOL NOS ORME NA9188PCB	5/10/91	LANDFILL

INCINERATION OCCURRED AT ENSCO, INC., AMERICAN OIL ROAD, ELDORADO, AR 71730  
EPA ID NUMBER ARD069748192ITEMS WERE LANDFILLED AT: U.S. ECOLOGY CHEMICAL WASTE MANAGEMENT  
EPA ID NUMBER(S) NVT330010000 ALD000622464

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 1001 AND 15 U.S.C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSON WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

BY Ann Cathey  
NAME ANN CATHEY  
TITLE WASTE TRACKING MANAGER  
DATE 06/14/91

ENSOCO INCORPORATED

Attachment 16

**CERTIFICATION**

P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4160 **No.**

87574

Invoice No. 65318

**CERTIFICATE OF DISPOSAL**

ABB SERVICE COMPANY  
ATTN: DOMINIC POLIZZI  
400 BILTMORE SUITE 520  
FENTON, MO 63026

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST MO000002160  
HAVE BEEN PROCESSED AS DESCRIBED BELOW:

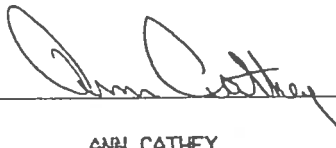
SEQ#	ITEM#	ITEM#	DESCRIPTION	DATE OF DISPOSAL	DISPOSAL PROCESS/PROCESSES	SERIAL NUMBER
1.	00919671	00000101	HAZ SUB LIQ NOS ORME NA9188PCB	6/26/91	INCINERATION/LANDFILL	710369
1.	00919672	00000102	HAZ SUB LIQ NOS ORME NA9188PCB	6/26/91	INCINERATION/LANDFILL	710368
1.	00919673	00000103	HAZ SUB LIQ NOS ORME NA9188PCB	6/26/91	INCINERATION/LANDFILL	917139

INCINERATION OCCURRED AT ENSCO, INC., AMERICAN OIL ROAD, ELDORADO, AR 71730 EPA ID NUMBER ARD069748192.

ITEMS WERE LANDFILLED AT U.S. ECOLOGY

EPA ID NUMBER(S) NVT330010000

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 1001 AND 15 U.S.C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

BY   
NAME ANN CATHEY  
TITLE WASTE TRACKING MANAGER  
DATE 8/07/91

ENSCO INCORPORATED

Attachment 17





**CERTIFICATION**

P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4160 **No.**

87575

Invoice No. 65332

**CERTIFICATE OF DISPOSAL**

ABB SERVICE COMPANY  
ATTN: DOMINIC POLIZZI  
400 BILTMORE SUITE 520  
FENTON, MO 63026

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST MO000002161  
HAVE BEEN PROCESSED AS DESCRIBED BELOW:


SEQ#	ITEM#	ENSCO CUST	DESCRIPTION	DATE OF DISPOSAL	DISPOSAL PROCESS/PROCESSES	SERIAL NUMBER
1.	00919641	00000101	HAZ SUB LIQ NOS ORME NA9188PCB	6/26/91	INCINERATION/LANDFILL	7103077
1.	00919642	00000102	HAZ SUB LIQ NOS ORME NA9188PCB	6/26/91	INCINERATION/LANDFILL	7103075

INCINERATION OCCURRED AT ENSCO, INC., AMERICAN OIL ROAD, ELDORADO, AR 71730 EPA ID NUMBER ARD069746192.

ITEMS WERE LANDFILLED AT U.S. ECOLOGY

EPA ID NUMBER(S) MVT330010000

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 1001 AND 15 U.S.C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

BY   
NAME ANN CATHEY  
TITLE WASTE TRACKING MANAGER  
DATE 8/07/91

ENSCO INCORPORATED

**CERTIFICATION**P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4180 **No.**

91802

Invoice No. 69748

**CERTIFICATE OF DISPOSAL**

ARB SERVICE COMPANY  
ATTN: DOMINIC POLIZZI  
400 BILTHORE SUITE 520  
FENTON, MO 63026

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST NO010012197  
HAVE BEEN PROCESSED AS DESCRIBED BELOW:

SEQ#	ITEM#	ENSCO	CUST	DESCRIPTION	DATE OF DISPOSAL	DISPOSAL PROCESS/PROCESSES	SERIAL NUMBER
1.	00983508	00000101	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION/LANDFILL	6640615
1.	00983509	00000102	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION/LANDFILL	6622443
1.	00983510	00000103	HAZ SUB LIQ NOS ORME	HA9188PCB	9/26/91	INCINERATION/LANDFILL	716359
1.	00983511	00000104	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION/LANDFILL	6147460
2.	00983512	00000201	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION	
2.	00983513	00000202	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION	
2.	00983514	00000203	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION	
2.	00983515	00000204	HAZ SUB LIQ NOS ORME	HA9188PCB	10/24/91	INCINERATION	
3.	00983516	00000301	HAZ SUB SOL NOS ORME	HA9188PCB	8/16/91	LANDFILL	

INCINERATION OCCURRED AT ENSCO, INC., AMERICAN OIL ROAD, ELDORADO, AR 71730 EPA ID NUMBER ARD069748192.

ITEMS WERE LANDFILLED AT U.S. ECOLOGY

EPA ID NUMBER(S) HW7330010000

ITEMS WERE LANDFILLED AT CHEMICAL WASTE MANAGEMENT

EPA ID NUMBER(S) ALD0000622464

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 1001 AND 15 U.S.C. 2618), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

NAME WILLIAM P. CLARK

TITLE PLANT MANAGER

DATE 11/09/91

ENSCO INCORPORATED

*Attachment 19*



DEC 19

**CERTIFICATION**

P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4160

**No.**

F2130

Invoice No. 70770

**CERTIFICATE OF DISPOSAL**

APP SERVICE COMPANY  
ATTN: DOMINIC POLIST  
400 RITMORE SUITE 500  
FENTON, MO 63024

ENSOC CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY NO-IFEST NO-000002206  
HAVE BEEN PROCESSED TO MEET THE FOLLOWING:

ENSOC	DISP	DESCRIPTION	DATE OF DISPOSAL	PROCESS/RECYCLES	SPECIAL NUMBER
1. 00094705	00000111	WAT OIL TO WAS OIL	10/24/91	INCINERATION/LANDFILL	6417740 ✓
1. 00094705	00000111	WAT OIL TO WAS OIL	10/24/91	INCINERATION/LANDFILL	6417740 ✓
1. 00094705	00000111	WAT OIL TO WAS OIL	10/24/91	INCINERATION/LANDFILL	6417740 ✓
1. 00094705	00000111	WAT OIL TO WAS OIL	10/24/91	INCINERATION/LANDFILL	6417740 ✓

INCINERATION/CLAYTON T. WILSON, INC., 4000 OIL ROAD, ELIZABETH, NJ 07208 EPA ID NUMBER: A55045748100

ITEMS WERE LANDFILLED AT	WILSON, DOMINIC	EPA ID NUMBER(S): W0330010000
ITEMS WERE LANDFILLED AT	CLAYTON WASTE MANAGEMENT	EPA ID NUMBER(S): W0330010000
ITEMS WERE LANDFILLED AT	CLAYTON WASTE MANAGEMENT, INC.	EPA ID NUMBER(S): W0330010000

UNDER OATH AND UNDER PENALTY OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. SECTION 1001), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE, AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY. I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

BY

NAME

TITLE

DATE

WILLIAM P. CLARK

PLANT MANAGER

11/21/91

ENSOC INCORPORATED

Attachment 20

Page No: 1



NOV 22

**CERTIFICATION**

P.O. BOX 8513 333 EXECUTIVE COURT LITTLE ROCK, AR 72205 (501) 223-4160

**No.**

91803

Invoice No. 71436

## CERTIFICATE OF DISPOSAL

ABB SERVICE COMPANY  
ATTN: DOMINIC FOLIZZI  
400 BILTMORE SUITE 520  
FENTON, MO 63026

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST M0000002216  
HAVE BEEN PROCESSED AS DESCRIBED BELOW:

ENSCO SERIAL NUMBER	CUST ITEM#	DESCRIPTION	DATE OF DISPOSAL	PROCESS/PROCESSER	SERIAL NUMBER
1. 00013933	00000101	HAZ SUB LIQ NOS ORME NA9188FCB	9/30/91	INCINERATION/LANDFILL	6622457
1. 00013935	00000102	HAZ SUB LIQ NOS ORME NA9188FCB	10/24/91	INCINERATION/LANDFILL	6417737
1. 00013936	00000103	HAZ SUB LIQ NOS ORME NA9188FCB	10/24/91	INCINERATION/LANDFILL	6622447
2. 00013937	00000201	HAZ SUB SOL NOS ORME NA9188FCB	9/30/91	LANDFILL	

INCINERATION OCCURRED AT ENSCO, INC., AMERICAN OIL ROAD, ELDORADO, AR 71730 EPA ID NUMBER ARD069748192.

ITEMS WERE LANDFILLED AT U.S. ECOLOGY EPA ID NUMBER(S) NVT330010000  
ITEMS WERE LANDFILLED AT CHEMICAL WASTE MANAGEMENT EPA ID NUMBER(S) ALD000622464

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 100) AND 15 U.S.C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

BY

NAME

WILLIAM P. CLARK

TITLE

PLANT MANAGER

DATE

11/09/91

ENSCO INCORPORATED

Page No: 1

SA2-11 (REV. 2/89)

Attachment 21

PCB TRANSFORMERS IN SERVICE 31 DEC 89

ID NUMBER	LOCATION	GALLONS	WEIGHT (KG)	REMOVED FROM SERVICE	TRANS- PORTED	DESTROYED
6417742	BLDG 002: COL 10F (L-1)	245	1140	/ /	/ /	/ /
6622447	BLDG 002: COL 10F (P-1)	305	1782	/ /	/ /	/ /
6417758	BLDG 002: COL 10B (L-2)	245	1440	/ /	/ /	/ /
6640615	BLDG 002: COL 10B (P-2)	305	1782	/ /	/ /	/ /
6417737	BLDG 002: COL 25F (L-3)	245	1440	/ /	/ /	/ /
6622457	BLDG 002: COL 25F (P-3)	385	2250	/ /	/ /	/ /
6417746	BLDG 002: COL 25BBC' (L-4)	245	1440	/ /	/ /	/ /
6622443	BLDG 002: COL 25BBC' (P-4)	385	2250	/ /	/ /	/ /
1760036	BLDG 002: COL 26C (FR 27)	154	900	/ /	/ /	/ /
NONE	BLDG 003: BASEMENT	173	1013	/ /	/ /	/ /
6622465	BLDG 005: EAST OF BOILER HOU	385	2250	/ /	/ /	/ /
917139	BLDG 027: CAR BOTTOM FURNACE	370	2165	/ /	/ /	/ /
7103069	BLDG 027: TR #21 (L-21)	245	1440	/ /	/ /	/ /
7103077	BLDG 027: TR #21 (P-21)	330	1935	/ /	/ /	/ /
7103068	BLDG 027: TR #22 (L-22)	245	1440	/ /	/ /	/ /
7103075	BLDG 027: TR #22 (P-22)	330	1935	/ /	/ /	/ /
YOP70491	BLDG 027: HEAT TREAT (P-26)	240	1242	/ /	/ /	/ /

Attachment 22

PCB TRANSFORMERS IN SERVICE 31 DEC 89

ID NUMBER	LOCATION	GALLONS	WEIGHT (KG)	REMOVED FROM SERVICE	TRANS- PORTED	DESTROYED
6335506	BLDG 042: ROOM 110 (P-13)	415	2410	/ /	/ /	/ /
5699110	BLDG 042: ROOM 110 (L-8)	280	1638	/ /	/ /	/ /
ULP-1	BLDG 043: SS OF BLDG	680	4168	/ /	/ /	/ /
9M2588	BLDG 102: COL 11A	750	4410	/ /	/ /	/ /
29314	BLDG 103: COMPRESSOR ROOM	676	3960	/ /	/ /	/ /
29315	BLDG 103: COMPRESSOR ROOM	556	3249	/ /	/ /	/ /
*** Total ***		8189	47679			

PCB CONTAMINATED TRANSFORMERS IN SERVICE 31 DEC 1989  
(Over 50 mg/l, but less than 500 mg/l)

TRANSFORMER SUBSTATION	TRANSFORMER NUMBER	GALLON CONTENT	PCB's (ppm)	WEIGHT (kg)
8	008HVT2	1060	73.7	3816
8	008HVT1	847	69.4	3049
8	008HVT4	760	52.3	2736
8	008HVT3	7100	104.8	25560
44	6147466	114	129.3	410
44	6147467	114	92.5	410
20	020HVT3	1654	91.5	5954
20	020HVT2	1654	97.6	5954
20	020HVT1	1654	89.4	5954
20	020HVT5	2153	108.5	7751
<hr/>				
TOTALS	10 TRANSFORMERS	17110		61594

## HAZARDOUS WASTE CHEMICAL ANALYSIS

DATE REQUESTED 12-3-82  
SAMPLE I.D. 666-7-6147466

REQUEST A CHEMICAL ANALYSIS AS FOLLOWS:

MATERIAL/SOLUTION NAME Electrical Transformer Dielectric Fluid  
DEPARTMENT MAINT. BUILDING/LOCATION Tract I Substation 44  
NOW IN TANK NO. \_\_\_\_\_ ORIGINAL TANK NO. \_\_\_\_\_  
MISCELLANEOUS INFORMATION OR IDENTIFICATION \_\_\_\_\_

## TEST ONLY ITEMS CHECKED

PCB - Contaminated  
Transformer

- ☐ SPECIFIC GRAVITY \_\_\_\_\_
- ☐ pH \_\_\_\_\_
- ☐ COLOR \_\_\_\_\_
- ☐ FLASH POINT (PMCC) \_\_\_\_\_ ° CENTIGRADE
- ☐ % SOLUBILITY (REFERENCE \_\_\_\_\_) \_\_\_\_\_
- ☒ PCB'S [TYPE(S) Aroclor 1260] \_\_\_\_\_ 129.3 PPM (W/W) PCB isomers
- ☐ % BY WT VOLATILES AT 100 °C \_\_\_\_\_
- ☐ % BY WT VOLATILES AT 600 °C \_\_\_\_\_
- ☐ % OIL/GREASE \_\_\_\_\_
- ☐ CHLORINE AS \_\_\_\_\_ mg/l  $\text{Cl}^-$
- ☐ AMMONIA AS \_\_\_\_\_ mg/l  $\text{N}^{+3}$
- ☐ CYANIDE AS \_\_\_\_\_ % BY WT  $\text{CN}^-$
- ☐ HEX CHROMIUM AS \_\_\_\_\_ % BY WT  $\text{Cr}^{+6}$
- ☐ HYDRO FLUORIC ACID AS \_\_\_\_\_ % BY WT HF
- ☐ NITRIC ACID AS \_\_\_\_\_ % BY WT  $\text{HNO}_3$
- ☐ SODIUM HYDROXIDE AS \_\_\_\_\_ % BY WT  $\text{NaOH}$
- ☐ ORGANIC CHLORIDES AS \_\_\_\_\_ mg/l OR % BY WT  $\text{Cl}^-$
- ☐ SULFIDES \_\_\_\_\_ % BY WT  $\text{S}^{2-}$
- ☐ TOTAL CHROMIUM \_\_\_\_\_ mg/l
- ☐ INORGANIC CHLORIDES \_\_\_\_\_ % BY WT  $\text{Cl}^-$
- ☐ INORGANIC FLUORIDES \_\_\_\_\_ % BY WT  $\text{F}^-$
- ☐ INORGANIC NITRATES \_\_\_\_\_ % BY WT  $\text{NO}_3^-$
- ☐ INORGANIC PHOSPHATES \_\_\_\_\_ % BY WT  $\text{PO}_4^{3-}$
- ☐ INORGANIC SULFATES \_\_\_\_\_ % BY WT  $\text{SO}_4^{2-}$
- ☐ SULFURIC ACID AS \_\_\_\_\_ % BY WT  $\text{H}_2\text{SO}_4$

Attachment 23

TESTED BY Jim Twichell EMPLOYEE NO. 181994  
DATE TESTED 1/15/83  
METHOD USED electron capture gas chromatography



## HAZARDOUS WASTE CHEMICAL ANALYSIS

DATE REQUESTED 12-3-82  
SAMPLE I.D. 667-8-6147467

REQUEST A CHEMICAL ANALYSIS AS FOLLOWS:

MATERIAL/SOLUTION NAME Electrical Transformer Dielectric Fluid  
DEPARTMENT MAINT. BUILDING/LOCATION Tract I Substation 44  
NOW IN TANK NO. \_\_\_\_\_ ORIGINAL TANK NO. \_\_\_\_\_  
MISCELLANEOUS INFORMATION OR IDENTIFICATION \_\_\_\_\_

## TEST ONLY ITEMS CHECKED

PCB contaminated  
Transformer

- ☐ SPECIFIC GRAVITY \_\_\_\_\_
- ☐ pH \_\_\_\_\_
- ☐ COLOR \_\_\_\_\_
- ☐ FLASH POINT (PMCC) \_\_\_\_\_ ° CENTIGRADE
- ☐ % SOLUBILITY (REFERENCE \_\_\_\_\_) \_\_\_\_\_
- ☒ PCB'S [TYPE(S) Aroclor 1260] 92.5 PPM (W/W) PCB isomers
- ☐ % BY WT VOLATILES AT 100 °C \_\_\_\_\_
- ☐ % BY WT VOLATILES AT 600 °C \_\_\_\_\_
- ☐ % OIL/GREASE \_\_\_\_\_
- ☐ CHLORINE AS \_\_\_\_\_ mg/l  $\text{Cl}^-$
- ☐ AMMONIA AS \_\_\_\_\_ mg/l  $\text{N}^{+3}$
- ☐ CYANIDE AS \_\_\_\_\_ % BY WT  $\text{CN}^-$
- ☐ HEX CHROMIUM AS \_\_\_\_\_ % BY WT  $\text{Cr}^{+6}$
- ☐ HYDRO FLUORIC ACID AS \_\_\_\_\_ % BY WT HF
- ☐ NITRIC ACID AS \_\_\_\_\_ % BY WT  $\text{HNO}_3$
- ☐ SODIUM HYDROXIDE AS \_\_\_\_\_ % BY WT  $\text{NaOH}$
- ☐ ORGANIC CHLORIDES AS \_\_\_\_\_ mg/l OR % BY WT  $\text{Cl}^-$
- ☐ SULFIDES \_\_\_\_\_ % BY WT  $\text{S}^{2-}$
- ☐ TOTAL CHROMIUM \_\_\_\_\_ mg/l
- ☐ INORGANIC CHLORIDES \_\_\_\_\_ % BY WT  $\text{Cl}^-$
- ☐ INORGANIC FLUORIDES \_\_\_\_\_ % BY WT  $\text{F}^-$
- ☐ INORGANIC NITRATES \_\_\_\_\_ % BY WT  $\text{NO}_3^-$
- ☐ INORGANIC PHOSPHATES \_\_\_\_\_ % BY WT  $\text{PO}_4^{3-}$
- ☐ INORGANIC SULFATES \_\_\_\_\_ % BY WT  $\text{SO}_4^{2-}$
- ☐ SULFURIC ACID AS \_\_\_\_\_ % BY WT  $\text{H}_2\text{SO}_4$

Attachment 24

TESTED BY Jim Twichell EMPLOYEE NO. 181994  
DATE TESTED 1/15/83  
METHOD USED electron capture gas chromatography

TELEPHONE OR CONFERENCE RECORD

File McDonnell Douglas Aerospace

Date 05/15/97

TELEPHONE

CONFERENCE

Incoming ( )

Field ( )

Outgoing (X)

Office ( )

SUBJECT 1991 Annual Document

PERSONS INVOLVED

Name

Representing

Mr. Gary Buford

MDA

Mr. Robert Krager

MDNR/HWP

SUMMARY OF CONVERSATION I called Mr. Buford to tell him of a possible discrepancy in their 1991 Annual Document that I did not observe during the inspection. I told him, according to the number of transformers shipped for disposal during 1991, the ending number of PCB transformers was incorrect. Mr. Buford compared the serial numbers with on the manifests with the serial numbers on their list of transformers. Transformer SN 6147465 was untested, according to the list, but the Manifest No 02197 showed the transformer as PCB. I  
ACTION TAKEN asked Mr. Buford to determine if the transformer in question had been tested and if so, to amend the annual documents affected by the transformer.

FINAL RESULTS

Robert H. Krager

Signature

# PCB ANNUAL REPORT DOCUMENT

**McDonnell Aircraft Company - St. Louis**

**For the Reporting Period**

**01 January 1992 - 31 December 1992**

Environmental Compliance  
Dept.064 c  
17 June 1993

*Attachment 26*

40 CFR 761.180 (a) (1)

Quantities of PCBs and PCB Items Removed From Service and Placed Into Storage and  
Placed Into Storage for Disposal during 01 January 1992--- 31 December 1992.

(i) Total weight of PCBs and PCB Items in Containers: .....14639.5 (kg.)

Liquids:.....1767 (kg.)  
Capacitors:.....0 (kg.)  
PCB Contaminated Material:.....530.6(kg.)  
Non-regulated Ballasts:.....12341.9(kg.)

(ii) Total number of PCB Transformers:.....0  
Total weight of PCBs contained in the transformers: ..0 (kg.)

(iii) Total number of PCB Large Capacitors :  
(not in containers listed above):.....0

A printout is attached that contains information on each individual container, transformer  
and large capacitor.

PCB and PCB Items in Service at the end of this reporting period:  
01 January 1992--- 31 December 1992

- (i) Total weight of PCBs and PCB Items in containers.....NONE
- (ii) Total number of PCB Transformers (> 500 ppm).....7.  
Total weight of PCBs in these transformers:.....22.085 kg.
- (iii) Total number of PCB Large Capacitors:.....0

The attached printout provides a detailed listing of the in-service PCB Items.

# PCB ANNUAL REPORT DOCUMENT

**McDonnell Aircraft Company - St. Louis**

**For the Reporting Period**

**01 January 1993 - 31 December 1993**

Environmental Compliance

Dept.064 c

17 June 1994

*Attachment 27*

**40 CFR 761.180 (a) (1)**

---

Quantities of PCBs and PCB Items Removed From Service and Placed Into Storage and Placed Into Storage for Disposal during 01 January 1993--- 31 December 1993.

---

(i) Total weight of PCBs and PCB Items in Containers: .....37,700 (kg.)

Liquids:.....3,497 (kg.)  
Capacitors:.....0 (kg.)  
PCB Contaminated Material:.....936(kg.)  
Non-regulated Ballasts:.....33,267(kg.)

(ii) Total number of PCB Transformers:.....2  
Total weight of PCBs contained in the transformers: .....5,731 (kg.)

(iii) Total number of PCB Large Capacitors :  
(not in containers listed above):.....0

A printout is attached that contains information on each individual container, transformer and large capacitor.

PCB and PCB Items in Service at the end of this reporting period:

01 January 1993--- 31 December 1993

- (i) Total weight of PCBs and PCB Items in containers.....NONE
- (ii) Total number of PCB Transformers (> 500 ppm).....5.  
Total weight of PCBs in these transformers:.....18,037 kg.
- (iii) Total number of PCB Large Capacitors:.....0

The attached printout provides a detailed listing of the in-service PCB Items.



06/17/94

PCB TRANSFORMERS

ID NUMBER	LOCATION	GALLONS	WEIGHT (kg)
6622465	BLDG. 5: EAST OF BOILER HOUSE	385	2250
6335506	BLDG. 42: ROOM 110 (P-13)	415	* 2410
5699110	BLDG. 42: ROOM 110 (L-8)	280	* 1638
ULP-1	BLDG 43: SS OF BLDG.	680	*4168
9M2588	BLDG. 102: COL. 11A	750	4410
29314	BLDG. 103: COMPRESSOR ROOM	676	3960
29315	BLDG. 103: COMPRESSOR ROOM	556	3249
***TOTAL***			22085

\* TRANSFORMERS REMOVED 02/04/93.

THIS DOCUMENT IS NOT TO BE USED ON ANY OTHER FORMS OR FOR ANY OTHER PURPOSES

Division of Environmental Quality  
Hazardous Waste Program  
P.O. Box 176, Jefferson City, Missouri 65102  
314-751-5176

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHIEF TREC  
1-800-241-3300  
DEPT. OF NATURAL RESOURCES  
314-634-6288

# HAZARDOUS WASTE MANIFEST

Form Approved OMB No 2050-0039, Expires 9-30-94

1. Generator's US EPA ID No. **MO D 0 0 0 0 1 8 8 1 8 9 6 1 3 1 8 7 9**

2. Page **1** of **2**

3. Generator's Name and Mailing Address  
**McDonnell Douglas**  
**Kindergarten McDonnell Blvd, Bantree RD, Bldg. 42**  
**Hazelwood, MO 63042**  
**St. Louis, MO 63166**

4. Generator's Phone  
**314-232-5852**

5. Transporter 1 Company Name  
**Aptus, Inc.**

6. Transporter 1 US EPA ID Number  
**MO D 0 0 0 0 1 8 8 1 8 9 6 1 3 1 8 7 9**

7. Transporter 2 Company Name  
**Aptus, Inc.**

8. Transporter 2 US EPA ID Number  
**MO D 0 0 0 0 1 8 8 1 8 9 6 1 3 1 8 7 9**

9. Designated Facility Name and Site Address  
**Aptus, Inc.**  
**P.O. Box 11328 Hwy. 169 North**  
**Coffeyville, KS 67337**

10. Designated Facility US EPA ID Number  
**KS D 9 8 1 5 0 6 0 2 5**

	12. Containers		13. Total Quantity	14. Unit (Lb, Kg, Gal, etc.)
	Number	Type		
a. <b>RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S.,</b> <b>ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)</b>	<b>002</b>	<b>C, M</b>	<b>5731</b>	<b>K</b>
b. <b>RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S.,</b> <b>ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)</b>	<b>003</b>	<b>D, M</b>	<b>135</b>	<b>K</b>
c. <b>RQ HAZARDOUS SUBSTANCE, LIQUID, N.O.S.,</b> <b>ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)</b>	<b>013</b>	<b>D, M</b>	<b>3497</b>	<b>K</b>
d.				

15. Special Handling Instructions and Additional Information  
**See Enclosed Contingency Plan to generator.**  
**IF unable to deliver to designated TSD facility, Return Work Order #95877**  
**EMERGENCY NUMBER (314) 232-2285**  
**PCB MANIFEST 01001-02513**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.  
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

Printed/Typed Name **Bryan E. Kury** Signature **Bryan E. Kury** Month **09** Day **09** Year **93**

17. Transporter 1 Acknowledgement of Receipt of Materials  
Printed/Typed Name **STEVE ETHELTON** Signature **Steve Ethelton** Date **02/09/93**

18. Transporter 2 Acknowledgement of Receipt of Materials  
Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

19. Discrepancy Indication Space  
**2-26-93 REPORTED TO DON HAGER WEIGHT DISCREPANCIES: 11c-4090 Kg CHECKED IN.c.**

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  
Printed/Typed Name **Larry T. Hager** Signature **Larry T. Hager** Date \_\_\_\_\_

GENERATOR FINAL COPY - PART 2

THIS COPY MUST BE RETAINED BY THE GENERATOR AFTER ITS RETURN FROM THE TSDF.

Attachment 28



# PCB ANNUAL REPORT DOCUMENT

**McDonnell Douglas Aerospace**

**For the Reporting Period**

**01 January 1994 - 31 December 1994**

Environmental Compliance

Dept. 064 c

26 June 1995

*Attachment 29*

**40 CFR 761.180 (a) (1)**

---

Quantities of PCBs and PCB Items Removed From Service and Placed Into Storage and Placed Into Storage for Disposal during 01 January 1994--- 31 December 1994.

---

(i) Total weight of PCBs and PCB Items in Containers: .....16,080. (kg.)

Liquids:..... 0 (kg.)  
Capacitors:.....0 (kg.)  
PCB Contaminated Material:.....622 (kg.)  
Non-regulated Ballasts:.....15,458 (kg.)

(ii) Total number of PCB Transformers:.....6  
Total weight of PCBs contained in the transformers: .....40,479 (kg.)

(iii) Total number of PCB Large Capacitors :  
(not in containers listed above):.....0

A printout is attached that contains information on each individual container, transformer and large capacitor.

06/27/95

**40 CFR 761.180 (a) (3)**

PCB and PCB Items in Service at the end of this reporting period:  
01 January 1994 - 31 December 1994

- (i) Total weight of PCBs and PCB Items in containers none
- (ii) Total number of PCB Transformers (>500ppm) 1  
Total weight of PCBs in these transformers: 2250 kg.
- (iii) Total number of Large Capacitors 0

The attached printed provides a detailed listing of the in-service PCB Items.

Att 29 pg 3

06/27/95

PCB TRANSFORMERS

ID NUMBER	LOCATION	GALLONS	WEIGHT (kg)	REMOVED
6622465	BLDG. 5 east of boiler room	385	2250	In place
6335506	BLDG. 42; rm.110	415	2410	2/4/93
5699110	BLDG. 42; RM.110	280	1638	2/4/93
ULP-1	BLDG. 43; SS. BLDG.	680	4168	8/15/94
9M2588	BLDG. 102; COL.11A	750	4410	12/23/94
29314	BLDG.103: Comp.rm.	676	3960	12/23/94
29315	BLDG.103: Comp. rm.	556	3249	12/23/94
***TOTAL***			22085	
***TOTAL IN SERVICE***			2250	

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.  
THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Division of Environmental Quality  
Hazardous Waste Program  
P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2435

HAZARDOUS WASTE MANIFEST

Print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 0 0 8 1 8 9 6 3 0 2 7 9 4	Manifest Document No. 2	2. Page 1 of 2	Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address McDonnell Douglas Linburgh & McDonnell Blvd. Hazelwood, MO 63042		4. Generator's Phone ( 314 ) 232-3319		5. Transporter 1 Company Name Environmental Transportation Services, Inc.	
6. US EPA ID Number O R D 9 8 1 6 0 5 3 6 3		7. Transporter 2 Company Name		8. US EPA ID Number	
9. Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337		10. US EPA ID Number K S D 9 8 1 5 0 6 0 2 5		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	
a. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGII		12. Containers Number Type 0 0 1 C M		13. Total Quantity 0 9 3 0 4	
b. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGII		14. Unit K		15. Waste Code K 0 0 0 5	
c. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGII		16. Unit K		17. Waste Code K 0 0 0 5	
d. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGII		18. Unit K		19. Waste Code K 0 0 0 5	
15. Special Handling Instructions and Additional Information Work Order #95878 EMERGENCY NUMBER 314-232-2285		PCB MANIFEST Aptus Manifest #WJ12M If unable to deliver to designated to TSD Facility, return to Generator.		Trailer # 5250-Ks	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date	
19. Discrepancy Indication Space		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Date		21. THIS COPY MUST BE RETAINED BY THE GENERATOR AFTER ITS RETURN FROM THE TSD.	

GENERATOR FINAL COPY - PART 2



CONTINUATION SHEET

GENERATOR NAME <i>McDonnell Douglas</i>	MANIFEST NUMBER <i>02794</i>	PAGE <i>1</i>	OF <i>2</i>
--	---------------------------------	------------------	----------------

This continuation sheet contains the information required under 40CFR761.207 - T11E.  
MANIFEST-GENERAL REQUIREMENTS.

[illegible]

**CERTIFICATION:**

**SIGNATURE**

SIGNATURE

**TITLE**

DATE.

\*IF MORE SPACE IS NEEDED - PLEASE USE ANOTHER CONTINUATION SHEET\*

AH 30 pg 2

**APTUS**

October 3, 1994

Aptus, Inc.  
Environmental Services

P.O. Box 1328  
Coffeyville, KS 67337  
(316) 251-6380

DON HAGER  
MCDONNELL DOUGLAS  
LINDBURGH & MCDONNELL BLVD.  
HAZELWOOD, MO 63042-

RE: Aptus Document No. KJ12M

Dear DON HAGER:

Enclosed is your Certificate of Disposal from Aptus, which certifies that the waste material received on the referenced manifest has been properly disposed. Also enclosed is a detail summary of the movement of your material.

We appreciate your business and we look forward to assisting you with your waste management needs in the future.

Should you have any questions regarding our services, please contact your Facility Service Representative at 1-316-251-6380.

Kim Durst  
Manager, Business Department

Enclosures

**APTUS**

October 3, 1994

Aptus, Inc.  
Environmental Services

P.O. Box 1328  
Coffeyville, KS 67337  
(316) 251-8380

## CERTIFICATE OF DISPOSAL

NO. 24509

MCDONNELL DOUGLAS  
LINDBURGH & MCDONNELL BLVD.  
HAZELWOOD, MO 63042-

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #KJ12M WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 09/20/94. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

**APTUS**

EPA ID # KSD981506025

  
PETER D. HANLEY, P.E.

MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

# DETAIL REPORT

PAGE NO. 1

GENERATOR  
MCDONNELL DOUGLAS  
LINDBURGH & MCDONNELL BLVD.

CORRESPONDENT  
ABB SERVICE CO.  
400 BILTMORE, SUITE 520

WORKORDER # 95878  
APT DOC # KJ12M  
CUST MANIFEST: ~~8278~~

HAZELWOOD MD 63042-  
EPA # MD 000 818 963  
PHONE: 3142323319  
DON HAGER  
GOODE: 0086426

FENTON MD 63026-  
PHONE: 3143430232  
DOMINIC POLIZZI  
COODE: 0082999

STATE MANIFEST: 010012794  
DATE OF REPORT: 10/03/94  
SALESMAN:  
HOLD BACK: 0%

ITEM	PROTYPE	CNT	DESCRIPTION	SERIAL/DRUM #	CONCN	UNT	WT	QTY	UNT	LOCATN	DISPOSAL FACILITY	SHIPMAN	CDNUMBER	ACCEPTED	OUT/SRVC	SHIP	DESTROYD	CDSERV
1	PTRNS	1	TRANS	43ULP-1	PURE	PPM	12285	550.80	Cu ft	9307000	US ECOLOGY LANDFILL - BEATTY,NV	CKJ68	24509	08/25/94	08/15/94	09/01/94	09/19/94	10/03/94
2	PTRNS	1	TRANS	6147466	PURE	PPM	1665	45.50	Cu ft	9307000	US ECOLOGY LANDFILL - BEATTY,NV	CKJ68	24509	08/25/94	08/15/94	09/01/94	09/19/94	10/03/94
3	PTRNS	1	TRANS	6147467	PURE	PPM	1675	45.50	Cu ft	9307000	US ECOLOGY LANDFILL - BEATTY,NV	CKJ68	24509	08/25/94	08/15/94	09/01/94	09/19/94	10/03/94
4	PLQUD	1	TRANS	43ULP-1	PURE	PPM	8355	815.00	GALS	0000000	APTUS INCINERATOR COFFEYVILLE,KS	KJ12M	24509	08/25/94	08/15/94	09/09/94	09/20/94	10/03/94
5	PLQUD	1	TRANS	6147466	PURE	PPM	865	84.00	GALS	0000000	APTUS INCINERATOR COFFEYVILLE,KS	KJ12M	24509	08/25/94	08/15/94	09/09/94	09/20/94	10/03/94
6	PLQUD	1	TRANS	6147467	PURE	PPM	865	83.00	GALS	0000000	APTUS INCINERATOR COFFEYVILLE,KS	KJ12M	24509	08/25/94	08/15/94	09/09/94	09/20/94	10/03/94

MANIFESTS ON JOB NUMBER 95878  
KJ12M

Att 31 pg 3

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
WASTES.

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Division of Environmental Quality  
Hazardous Waste Program  
P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

00# 411  
12-27-94

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

# HAZARDOUS WASTE MANIFEST

Print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 0 0 8 1 8 9 0 6	Manifest Document No. 0 0 9 6 3	2. Page 1 of 1	Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address McDonnell Douglas Corporation Airport Rd & McDonnell Blvd St. Louis, MO 63134 4. Generator's Phone (314) 232-3319			A. Missouri Manifest Document Number 0 0 1 2 4 8 0 9 6 3 B. G.S.I. (Gen. Site Address) [REDACTED]		
5. Transporter 1 Company Name Matlack Systems, Inc. 6. US EPA ID Number D E D 9 8 1 1 1 0 1 6 6			C. MO. Trans. ID H1441 D. Transporter's Phone 800-433-7895		
7. Transporter 2 Company Name [REDACTED] 8. US EPA ID Number [REDACTED]			E. MO. Trans. ID [REDACTED] F. Transporter's Phone [REDACTED]		
9. Designated Facility Name and Site Address Tipton Environmental Technology, Inc. One Mile East Hwy 50 Tipton, MO 65081 10. US EPA ID Number M O D 9 8 1 5 0 6 6 1 1			G. State Facility ID HH1011 H. Facility's Phone 816-433-5585		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol.	15. Waste No.
a. Polychlorinated biphenyls, (non-RCRA Hazardous Waste Solid, last contained GT 500 ppm PCB, in Transformer case, LT DOT RQ)		3 CM	1,705.9 K		EPA WASTE CODE H001 STATE MO DOT 16
b. Polychlorinated biphenyls (non-RCRA Hazardous Waste Solid GT 500 ppm PCB's, LT DOT RQ)		1 DM	46.5 EA 9.0 K		EPA WASTE CODE H001 STATE MO DOT 19
c.					EPA WASTE CODE [REDACTED] STATE [REDACTED]
d.					EPA WASTE CODE [REDACTED] STATE [REDACTED]
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)			
a. PCB Trans Dr GT 500		a. 5 9 9 0 8 0			
b. PCB debris		b. 3 0 1 1 0 7			
c.		c.			
d.		d.			
15 Special Handling Instructions and Additional Information PCB Manifest See continuation sheet for additional information. Emergency Contact: (314)232-2285. If unable to deliver to designated facility, return to generator.					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.					
Printed/Typed Name Bryan Kury		Signature [Signature]		Month Day Year 11 23 94	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Billy Thompson		Signature [Signature]		Month Day Year 12 24 94	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name [REDACTED]		Signature [REDACTED]		Month Day Year [REDACTED]	
19. Discrepancy Indication Space 13) wt. variance of 10%. EA					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed/Typed Name Ellen Allen		Signature [Signature]		Month Day Year 12 27 94	

MISSOURI DNR FINAL COPY - PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

Annual Document Log & Work Order  
Tipton Environmental Technology, Inc.  
One Mile E. Hwy. 50, P.O. Box 849  
Tipton, MO 65081  
EPA#: MOD981506611

Generator: McDonnell Douglas Corp.; St. Louis, MO  
Generator US EPA ID #: MOD000818906

01/01/94 to 12/31/94  
Page 1 of 1

Work Order & Unique ID	Regulatory Description	Description	Mnft. #	Date of RFS for disposal	Date Rec'd	Weight Incoming	Outgoing	Outgoing Mnft. #	Transport Date	Disposer Name	Disposal Date
411 9M2588	PCB Article	PCB Dr Trans >	00963	12-23-94	12-27-94	7276.0					
		PCB Oil					45.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		PCB Flush					1896.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		MT PCB Trans D&F w/lid >					7267.0	95006	01-13-95	US Ecology, Beatty, NV	01-17-95
411 29314	PCB Article	PCB Dr Trans >	00963	12-23-94	12-27-94	5516.0					
		PCB Oil					99.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		PCB Flush					1723.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		MT PCB Trans D&F w/lid >					5452.0	95006	01-13-95	US Ecology, Beatty, NV	01-17-95
411 29315	PCB Article	PCB Dr Trans >	00963	12-23-94	12-27-94	4128.0					
		PCB Oil					63.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		PCB Flush					394.0	95002	01-05-95	Rollins Env Ser (TX)	01-10-95
		PCB Flush					1021.0	95004	01-06-95	Rollins Env Ser (TX)	01-16-95
		MT PCB Trans D&F w/lid >					4101.0	95006	01-13-95	US Ecology, Beatty, NV	01-17-95
411 9M2588-2	PCB Article	PCB Dr Trans Fin	00963	12-23-94	12-27-94	108.0					
		PCB Flush					41.0	95004	01-06-95	Rollins Env Ser (TX)	01-16-95
		MT PCB Trans Fin d&f w/lid					109.5	95006	01-13-95	US Ecology, Beatty, NV	01-17-95
411 9M2588-1	PCB Article	PCB Dr Trans Fin	00963	12-23-94	12-27-94	144.5					
		PCB Flush					56.0	95004	01-06-95	Rollins Env Ser (TX)	01-16-95
		MT PCB Trans Fin d&f w/lid					147.0	95006	01-13-95	US Ecology, Beatty, NV	01-17-95
411 MDC-1	PCB Container	DM PCB Debris for Inc.	00963	12-23-94	12-27-94	46.5	46.5	94169	12-30-94	Rollins Env Ser (TX)	01-17-95

TOTAL 17219.0 22461.0

#9M2588-2 & 9M2588-1 were fins attached to Trans# 9M2588 They will go out not attached to original transformer

97 kgs flush was used processing 2 Fins.

4 Kgs floor dir was used processing 2 Fins

5034 Kgs flush was used processing 3 Trans

107 Kgs floor dri was used processing 3 Trans

Att 32 pg 2

## MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

0138

## HAZARDOUS WASTE MANIFEST

T. E. T., INC.

## EMERGENCY RESPONSE

U.S. COAST GUARD

1-800-424-4462

CHEMTREC

1-800-424-9300

DEPT OF NATURAL RESOURCES

314-534-2435

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 9 8 1 5 0 6 6		Manifest Document No. 1 1 9 5 0 0 6		2. Page 1 of 6		Information in the shaded areas is required by State law.							
3. Generator's Name and Mailing Address <b>Tipton Environmental Technology, Inc.</b> One Mile East, Hwy 50 Tipton, MO. 65081 Attn: Steve Sidebottom				A. Missouri Manifest Document Number 5 0 0 6				B. G.S.I. (Gen. Site Address)							
4. Generator's Phone 816-433-5585				5. Transporter 1 Company Name <b>Matlack Systems Inc.</b>				6. US EPA ID Number D E D 9 8 1 1 1 0 1 6 6							
7. Transporter 2 Company Name				8. US EPA ID Number				C. MO. Trans. ID H1441/40448							
9. Designated Facility Name and Site Address <b>US Ecology, Inc.</b> Highway 95 Beatty, NV. 89003				10. US EPA ID Number N V T 3 3 0 0 1 0 0 0 0				D. Transporter's Phone 800-433-7895							
								E. MO. Trans. ID							
								F. Transporter's Phone							
								G. State Facility's ID LFNV83							
								H. Facility's Phone 702-553-2433							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol.		I. Waste No.			
a. Polychlorinated Biphenyls (NON-RCRA Hazardous Waste Solid last contained GT 500 ppm PCBs in transformer case, LT DOT RQ)						0 0 3 C M		1 6 8 2 0		K		EPA WASTE CODE N O N E STATE H 0 0 7			
b. Polychlorinated Biphenyls (NON-RCRA Hazardous Waste solid last contained GT 500 ppm PCBs in Transformer case, LT DOT RQ)						0 0 2 C M		2 5 6 5		K		EPA WASTE CODE N O N E STATE H 0 0 7			
c. Polychlorinated Biphenyls (NON-RCRA Hazardous Waste Solid, last contained GT 500 ppm PCBs LT DOT RQ)						0 0 2 C W		2 0 2 5		K		EPA WASTE CODE N O N E STATE H 0 1 2			
d. Polychlorinated Biphenyls (NON-RCRA Hazardous Waste Solid last contained GT 500 ppm PCBs, LT DOT RQ)						0 0 3 D M		1 8 2 5				EPA WASTE CODE N O N E STATE H 0 0 9			
J. Additional Descriptions for Materials Listed Above						K. HANDLING CODE (FACILITY USE ONLY)						COMMENTS			
a. 07-004-3369 MT PCB TRANS D&F w/ld GT 500 (CAT C)						INTERIM						FINAL			
b. 07-004-3369 MT PCB FINS D&F w/ld GT 500 (CAT J)															
c. 07-004-3369 PCB CRUSHED DRUMS (CAT K)															
d. 07-004-3369 DM PCB DEBRIS (CAT A-1)															
15. Special Handling Instructions and Additional Information 11a) PCB-1 11b) PCB-1 11c) PCB-2 11d.) PCB-2 PCB Manifest 24 Hour Emergency Number: 1-800-424-9300 (CHEMTREC) See attached continuation sheets & safety sheet for additional information.															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.															
Printed/Typed Name <b>Kent J. Moon</b>				Signature <i>Kent J. Moon</i>				Month Day Year 0 1 1 3 1 9 5							
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Andrew J. Dunn</i>				Month Day Year 0 1 1 3 1 9 5							
Printed/Typed Name <b>ANDREW J. DUNN</b>				Signature <i>Andrew J. Dunn</i>				Month Day Year 0 1 1 3 1 9 5							
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature <i>Danny L. Matz</i>				Month Day Year 0 1 1 3 1 9 5							
Printed/Typed Name <b>DANNY L. MATZ</b>				Signature <i>Danny L. Matz</i>				Month Day Year 0 1 1 3 1 9 5							
19. Discrepancy Indication Space															
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name <b>LOREN TAGUCHI</b>				Signature <i>Loren Taguchi</i>				Month Day Year 0 1 1 7 1 9 5							

MISSOURI DJR FINAL COPY PART 1

THIS COPY MUST BE SENT BACK TO THE CALIBRATION BY THE DESIGNATED FACILITY WITHIN 90 DAYS OF THE DATE OF THE MANIFEST

Page 2 of 6  
Manifest # 950061

TOTAL KG 16820 kg DATE 1-13-95  
SIGNATURE Leo J. Johnson



Page 6 of 6

At 33 pg 3

TOTAL KG 256.5 166

SIGNATURE

DATE 1-13-95

Herzlia

**US Ecology**

*an American Ecology company*

702-553-2203

Fax 702-553-2742

**Certificate of Receipt and Disposal of PCB Waste**

Disposal Facility

US Ecology, Inc.

P.O. Box 578

Beatty, NV 89003

EPA Identification Number

NVT330010000

Disposal Certification

Generator Name: Tipton Environmental Technology, Inc.

I HEREBY CERTIFY THAT PCB WASTE MATERIAL LISTED ON MANIFEST NO. 95006  
AND ANY ATTACHMENTS WAS:

- ☒ Received at the US Ecology, Inc., Beatty, Nevada facility on 1/17/95
- ☒ Landfilled at the US Ecology, Inc., Beatty, Nevada facility on 1/17/95
- ☐ Stored pending shipment for Off-Site Treatment/Incineration
- ☐ Shipped for Incineration on Manifest No. and Incinerated on

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified sections(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direction, made the verification that this information is true, accurate and complete.

For US Ecology, Inc.

P.A. Thayer  
P.A. Thayer

Date: January 17, 1995

*Attachment 34*

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087



T. E. T., INC.

JAN 17 1995

Form approved. OMB No. 2050-0039. expires 09/30/94

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 9 8 1 5 0 6 6 1		2. Page 1 Manifest Document No. T I P T O N , M O		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Tipton Environmental Technology, Inc.</b> <b>One Mile E. Hwy. 50</b> <b>Tipton, MO 65081</b> 4. Generator's Phone ( 816 ) 433-5585 Attn: Steve Sidebottom				A. State Manifest Document Number <b>00382040</b>			
5. Transporter 1 Company Name <b>Matlack Systems, Inc.</b>				6. US EPA ID Number <b>D E D 9 8 1 1 1 0 1 6 6</b>		B. State Generator's ID <b>99929</b>	
7. Transporter 2 Company Name				8. US EPA ID Number		C. State Transporter's ID <b>H 1 4 4 1 / 4 0 4 4 8</b>	
9. Designated Facility Name and Site Address <b>Rollins Environmental Services (TX), Inc.</b> <b>2027 Battleground Road</b> <b>Deer Park, TX 77536</b>				10. US EPA ID Number <b>T X D 0 5 5 1 4 1 3 7 8</b>		D. Transporter's Phone <b>800-433-7895</b>	
						E. State Transporter's ID	
						F. Transporter's Phone	
						G. State Facility's ID <b>0 1 1 2 5 0 0 8 9</b>	
						H. Facility's Phone <b>713-930-2300</b>	
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.		
	a. <b>RQ Polychlorinated Bipheyls, mixture, 9, UN2315, PGIII (liquid)</b>	<b>0 0 1</b>	<b>T T</b>	<b>1 6 2 9 3</b>	<b>K</b>	<b>MO04 OUTS-298-1</b>	
	b.						
	c.						
	d.						
J. Additional Descriptions for Materials Listed Above <b>PCB ON - 500-200-43805-4038</b>				K. Handling Codes for Wastes Listed Above <b>1M04</b> ✓			
15. Special Handling Instructions and Additional Information <b>PCB Manifest 24 hour emergency number: 800-424-9300 (Chemtrec) 11A)PCB-2</b> <b>See attached continuation sheets for additional information and safety sheets.</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name <b>Kent J. Moon</b>				Signature <i>Kent J. Moon</i>		Month Day Year <b>0 1 0 5 1 9 5</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Kenneth L. Cresson</i>		Date <b>0 1 0 5 1 9 5</b>	
Printed/Typed Name <b>Kenneth L. Cresson</b>				Signature <i>Kenneth L. Cresson</i>		Month Day Year <b>0 1 0 5 1 9 5</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. <b>RES (TX) INC</b> Printed/Typed Name <b>YU HONG CHEN</b> Signature <i>Yuhong Chen</i> Date <b>10/10/95</b>							

GENERATOR

TRANSPORTER

FACILITY

PAGE 2 OF 2  
MANIFEST # 950021382040

\* MANIFEST # 95002 / 382040

Alt 35 pg 2

TOTAL KG 16293 KGS

DATE 1-5-95

SIGNATURE:

D. Fisher

PROGRAM-ID: PTR1722C      ROLLINS ENVIRONMENTAL SERVICES (TX) INC  
RUN DATE : 1/18/95      CERTIFICATE OF DISPOSAL  
RUN TIME : 12:52 PM

PAGE: 1

\*\*\*\*\*

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
---	------------------	-----------------	--------------------	------------------	-------------------

\*\*\*\*\*

043605	175337		TX00382040	01/06/95	01/10/95
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T. E. T. INC.

95002

TIPTON ENVIRONMENTAL TECHNOLOGY INC  
1 MILE E HWY 50  
TIPTON MO 65081  
Attn: STEVE SIDEBOTTOM

TIPTON, MO

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	Contents	Prod SHP Code TO	Disposal Mthd Date
------------------------	------------------------------------	-------------------	----------	---------------------	-----------------------

000175337		BULK	LIQUID	38	I 01/10/95
Total Containers :		1			

Attachment 36

PROGRAM-ID: PTR1722C  
RUN DATE : 1/18/95  
RUN TIME : 12:52 PM

ROLLINS ENVIRONMENTAL SERVICES (TX) INC  
CERTIFICATE OF DISPOSAL

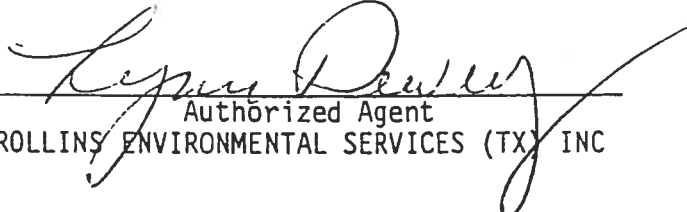
PAGE: 2

\*\*\*\*\*  
This completes the Certificates of Destruction per Manifest Number TX00382040.

\*\*\*\*\*  
\* Disposal Methods : \*  
\* 'I' - Waste that was incinerated. \*  
\* 'L' - Waste that was landfilled. \*  
\* Disposal Facility : ROLLINS ENVIRONMENTAL SERVICES (TX) INC \*  
\* PO BOX 609 \*  
\* DEER PARK TX 77536 \*  
\* EPA ID: TXD055141378 \*  
\*\*\*\*\*

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

  
\_\_\_\_\_  
Authorized Agent  
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

AT 36 pg 2

# **PCB ANNUAL REPORT DOCUMENT**

**McDonnell Douglas Aerospace**

**For the Reporting Period**

**01 January 1995 - 31 December 1995**

**Environmental Compliance**

**Dept. 064 c  
24 June 1996**

*Attachment 37*

**40 CFR 761.180 (a) (1)**

**Quantities of PCBs and PCB Items Removed From Service and Placed Into Storage for Disposal During 01 January 1995 and 31 December 1995.**

(i)	Total weight of PCBs and PCB Items in Containers	15,137 Kg.
	Liquids:	0 (Kg.)
	Capacitors:	0 (Kg.)
	PCB Contaminated Material:	1029 (Kg.)
	Non-Regulated Ballasts:	14,108 (Kg.)
(ii)	Total number of PCB Transformers:	0 (Kg.)
	Total weight of PCBs contained in Transformers:	0 (Kg.)
(iii)	Total number of PCB Large Capacitors:	0

A printout is attached that contains information on each individual container, transformer and large capacitor.



06/24/96

**40 CFR 761.180 (a) (3)**

PCB and PCB Items in Service at the end of this reporting period:  
01 January 1995 - 31 December 1995

- (i) Total weight of PCBs and PCB Items in containers none
- (ii) Total number of PCB Transformers (>500ppm) 1  
Total weight of PCBs in these transformers: 2250 kg.
- (iii) Total number of Large Capacitors 0

The attached printed provides a detailed listing of the in-service PCB Items.

Att 37 pg 3

06/24/96

PCB TRANSFORMERS

ID NUMBER	LOCATION	GALLONS	WEIGHT (kg)	REMOVED
6622465	BLDG. 5 east of boiler room	385	2250	In place
6335506	BLDG. 42; rm.110	415	2410	2/4/93
5699110	BLDG. 42; RM.110	280	1638	2/4/93
ULP-1	BLDG. 43; SS. BLDG.	680	4168	8/15/94
9M2588	BLDG. 102; COL.11A	750	4410	12/23/94
29314	BLDG.103: Comp.rm.	676	3960	12/23/94
29315	BLDG.103: Comp. rm.	556	3249	12/23/94
***TOTAL***			22085	
***TOTAL IN SERVICE***			2250	

06/24/96

PCB CONTAMINATED TRANSFORMERS IN SERVICE 31 DEC. 1995  
( Over 50 mg/l , but less than 500 mg/l )

TRANSFORMER SUBSTATION	TRANSFORMER NUMBER	GALLON CONTENT	PCB's (ppm)	WEIGHT (kg)
8	008HVT2	1060	73.7	3816
8	008HVT1	847	69.4	3049
8	008HVT4	760	52.3	2736
8	008HVT3	7100	104.8	25560
20	020HVT3	1654	91.5	5954
20	020HVT2	1654	97.6	5954
20	020HVT1	1654	89.4	5954
20	020HVT5	2153	108.5	7751
TOTALS	8 TRANSFORMERS	16882		60774

Att 37 pg 5

06/24/96

PCB CONTAMINATED TRANSFORMERS  
(POTENTIALLY PCB CONTAMINATED)

<u>TRANSFORMER</u> <u>SUSTATION</u>	<u>TRANSFORMER</u> <u>NUMBER</u>
SUBSTATION 8	2689-1
SUBSTATION 8	4014-1
SUBSTATION 8	2112329
SUBSTATION 8	2112328
BLDG. 6 (WEST)	2710-1
BLDG. 6 (WEST)	2710-2
BLDG. 6 (WEST)	2710-3
BLDG.51 (SOUTH)	3 ON POLE

PCB WEEKLY INSPECTION RECORD

Date: 5/7/96

Signature: Guy B. B.

Shelter Inspection

Agree	Disagree	Action Taken to Correct Discrepancies
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not leaking
<input checked="" type="checkbox"/>	<input type="checkbox"/>	No structural damage
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Doors labeled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Doors locked

Container Inspection

Agree	Disagree	Action Taken to Correct Discrepancies
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not leaking
<input checked="" type="checkbox"/>	<input type="checkbox"/>	All drums sealed
<input checked="" type="checkbox"/>	<input type="checkbox"/>	All drums marked "PCB" (6" label)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	"Start to fill date on drum
<input checked="" type="checkbox"/>	<input type="checkbox"/>	"Moved to storage" date on drum
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Weight marked on drum

Shelter Inventory

Total number of drums in shelter: 17

Inventory records updated?

Yes ☒ No ☐  
( ) ( )

VISUAL INSPECTION AND MAINTENANCE RECORDS  
PCB TRANSFORMERS (>500 ppm PCB) Pg. 1 of 2

rec'd from Don  
14 May 91

Year 1991 Quarter 1

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Cleanup Completed By (signature).
Bldg. 2 Col. 10F	6417742	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 2 Col. 10F	6622447	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 2 Col. 10B	6417758	3/18/91	SEEP	L. Hoffmeyer	CLEAN CAP & CHAIN JUST BELOW LIQUID LEVEL GAUGE	Completed	3/22/91	James T. (signature)
Bldg. 2 Col. 10B	6640615	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 2 Col. 25F	6417737	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 2 Col. 25F	6622457	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 2 Col. 25BBC	6417746	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM SOUTHWEST DRAIN COCK	Completed	3/22/91	James T. (signature)
Bldg. 2 Col. 25BBC	6622443	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM SOUTHWEST DRAIN COCK	Completed	3/22/91	James T. (signature)
Bldg. 2 Col. 26C	1760036	3/18/91	CLEAN	L. Hoffmeyer				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just under a gallon) must be reported immediately to MCAir Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

Quarterly inspections may take place any time during the periods January-March, April-June, July-September, and October-December, so long as there is a minimum of 30 days between inspections.

A "Clean" transformer has no PCB's on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates that there is PCB fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. A "Moderate Leak" means PCB fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of PCB fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

Attachment 39

**VISUAL INSPECTION D MAINTENANCE RECORDS**  
**PCB TRANSFORMERS (> 50 ppm PCB) Pg. 2 of 2**

Year 1991 Quarter 1

Dept. 898 receipt by: \_\_\_\_\_  
 Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Clean Completed By (signature).
Bldg. 3 Basement	None	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF H.V. SWITCH HANDLE	CLEANED	3-22-91	B.H. G.P.
Bldg. 5 E. of Bldg.	6622465	3/19/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Car Bottom Furnace	917139	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Trans Rm 21	7103069	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF CENTER H.V. SWITCH	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Trans Rm 21	7103077	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Trans Rm 22	7103068	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF NORTH H.V. SWITCH & ANGLE BEHIND SOUTH FINS	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Trans Rm 22	7103075	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF SOUTH H.V. SWITCH	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Heat Treat Bsmnt.	YOP70491	3/18/91	OUT OF SERVICE CLEAN	L. Hoffmeyer				
Bldg. 42 Room 110	6335506	3/18/91	MODERATE LEAK L102	L. Hoffmeyer	CLEAN BOTTOM OF DRAIN TACK, PAN, & FLOOR	CLEANED	3-22-91	B.H. G.P.
Bldg. 42 Room 110	5699110	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 43 SS of Bldg.	ULP-1	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM BOLTS OF L.V. BUS CONNECT BOX	CLEANED	3-22-91	B.H. G.P.
Bldg. 102 Col. 11A	9M2588	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF TAPCHANGER THROAT & BASE AT DRAIN COCK THROAT	CLEANED	3-22-91	B.H. G.P.
Bldg. 103 Compressor Rm	29314	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF TAPCHANGER	CLEANED	3-22-91	B.H. G.P.
Bldg. 103 Compressor Rm	29315	3/18/91	CLEAN	L. Hoffmeyer				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE A CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just over a gallon) must be reported immediately to MCAir Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

Quarterly inspections may take place any time during the periods January-March, April-June, July-September, and October-December, long as there is a minimum of 30 days between inspections.

A "Clean" transformer has no PCB's on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates that there is PCB fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. "Moderate Leak" means PCB fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of PCB fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

AH 39 pg 2

**MCDONNELL DOUGLAS AEROSPACE/ST. LOUIS  
ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES  
BUILDING 110/LEVEL 1/MC 1111099  
(314) 234-7177 (FAX)**

**DATE:** 5/20/97

**TO:** ROBERT KRAUER **FROM:** GARY BUFORD  
**DEPT:**                      **DEPT:** 464c  
**EXT:** 751-3126 **EXT:** 234-8171  
**LOCATION:** MoDNR **LOCATION:** MDA  
**FAX #:** 751-7869  
**PAGE(s) SENT:** 5 **(INCLUDES LEAD SHEET)**

**PLEASE CALL:**                      **AT EXTENSION:**                     

**IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION.**

**ADDITIONAL INFORMATION:**

**RECEIVED**

**MAY 19 1997**

**HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES**

*AH 39 pg 3*



CONFIRMED PCB-CONTAMINATED TRANSFORMERS (50-500 ppm)

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Year 1991 Quarter 1

Transformer Location	Transformer Number	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Cleanup Completed By (signature).
Sub-Station 8	008HVT2	3/19/91	CLEAN	L. Hoffinger	CLEAN L.V. CABLES & CONNECTION BOX & CONCRETE PAD	Completed	3/22/91	James F. Gage
Sub-Station 8	008HVT1	3/19/91	MODERATE LEAK <102	L. Hoffinger				
Sub-Station 8	008HVT4	3/19/91	CLEAN	L. Hoffinger	CLEAN L.V. CABLES & CONNECTION BOX, DRAIN COCK & CONCRETE PAD	Completed	3/22/91	James F. Gage
Sub-Station 8	008HVT3	3/19/91	MODERATE LEAK <102	L. Hoffinger				
Sub-Station 44	6147466	3/19/91	CLEAN	L. Hoffinger				
Sub-Station 44	6147467	3/19/91	CLEAN	L. Hoffinger	CLEAN BOTTOM FIN FLANGE (2" FROM MATH) & PAD UNDERNEATH	Completed	3/22/91	James F. Gage
Sub-Station 20	020HVT3	3/19/91	MODERATE LEAK <102	L. Hoffinger				
Sub-Station 20	020HVT2	3/19/91	CLEAN	L. Hoffinger	CLEAN BOTTOM DRAIN COCK	Completed	3/22/91	James F. Gage
Sub-Station 20	020HVT1	3/19/91	SEEP	L. Hoffinger				
Sub-Station 20	020HVT5	3/19/91	CLEAN	L. Hoffinger				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just under 1 gallon) must be reported immediately to MCAIR Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

EPA regulations require annual inspection of PCB-contaminated (50-500 ppm) transformers. MCAIR policy is to inspect them quarterly to ensure that any leakage is detected prior to serious spread of contaminated oil.

A "Clean" transformer has no PCB's on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates the there is PCB fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. "Moderate Leak" means PCB fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of PCB fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by end of each shift.

1991 20 27 12:10 PM MCAIR 511 1/13/91 4

POTENTIALLY PCB-CONTAMINATED TRANSFORMERS \* (50-500 ppm PCB) Pg. 1 of 1

Year 1991 Quarter 1

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Cleanup Completed By (signature).
Sub-Station 8	2689-1	3/19/91	CLEAN	<i>[Signature]</i>				
Sub-Station 8	4014-1	3/19/91	CLEAN	<i>[Signature]</i>				
Sub-Station 8	2112329	3/19/91	CLEAN	<i>[Signature]</i>				
Sub-Station 8	2112328	3/19/91	CLEAN	<i>[Signature]</i>				
Sub-Station 8	2112330	3/19/91	CLEAN	<i>[Signature]</i>				
Sub-Station 4d	6147465	3/19/91	CLEAN	<i>[Signature]</i>				
Bldg. 6 West side	2710-1	3/19/91	CLEAN	<i>[Signature]</i>				
Bldg. 6 West side	2710-2	3/19/91	CLEAN	<i>[Signature]</i>				
Bldg. 6 West side	2710-3	3/19/91	CLEAN	<i>[Signature]</i>				
Bldg. 51 South side	3 on pole	3/19/91	CLEAN	<i>[Signature]</i>				

This sheet last revised on 09/13/89

\* These are transformers that have not been sampled and analysed due to limiting conditions. EPA regulations require that all such mineral oil transformers be treated as potentially PCB-contaminated (50-500 ppm PCB).

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just under a gallon) must be reported immediately to MCAIR Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

EPA regulations require annual inspection of PCB-contaminated (50-500 ppm) transformers. MCAIR policy is to inspect these transformers quarterly to ensure that any leakage is discovered prior to serious spread of contaminated oil.

A "Clean" transformer has no dielectric fluid on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates that there is dielectric fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. A "Moderate Leak" means dielectric fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of dielectric fluid that may be PCB-contaminated must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

314 234 7177 IN 815/3/31/7865

101 20 31 12.17 PK TWH EMHS BIL

HT 39 pg 5

Year 1991 Quarter 1

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Cleanup Completed By (signature).
Bldg. 3 Basement	None	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF H.V. SWITCH HANDLE	CLEANED	3-22-91	B.H. G.P.
Bldg. 5 E. of Bldg.	6622465	3/19/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Car Bottom Furnace	917139	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Trans Rm 21	7103069	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF CENTER H.V. SWITCH	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Trans Rm 21	7103077	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 27 Trans Rm 22	7103068	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF NORTH H.V. SWITCH & ANGLE BEHIND SOUTH FINS	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Trans Rm 22	7103075	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF SOUTH H.V. SWITCH	CLEANED	3-22-91	B.H. G.P.
Bldg. 27 Heat Treat Bsmnt	YOP70491	3/18/91	SEEP	L. Hoffmeyer				
Bldg. 42 Room 110	6335506	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF DRAIN ROCK, PAN, & FLOOR	CLEANED	3-22-91	B.H. G.P.
Bldg. 42 Room 110	5699110	3/18/91	CLEAN	L. Hoffmeyer				
Bldg. 43 SS of Bldg.	ULF-1	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM BOLTS OF L.V. BUS CONNECT BOX	CLEANED	3-22-91	B.H. G.P.
Bldg. 102 Col. 11A	9N2588	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF TAP CHANGER THROAT & BASE AT DRUM C&K THROAT	CLEANED	3-22-91	B.H. G.P.
Bldg. 103 Compressor Rm	29314	3/18/91	SEEP	L. Hoffmeyer	CLEAN BOTTOM OF TAP CHANGER	CLEANED	3-22-91	B.H. G.P.
Bldg. 103 Compressor Rm	29315	3/18/91	CLEAN	L. Hoffmeyer				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just over a gallon) must be reported immediately to MCAIR Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

Quarterly inspections may take place any time during the periods January-March, April-June, July-September, and October-December, as long as there is a minimum of 30 days between inspections.

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Cloths and gloves used in minor cleanup of PCB Fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

VISUAL INSPECTION AND MAINTENANCE RECORDS  
PCB TRANSFORMERS (>500 ppm PCB) Pg. 1 of 2

Rec'd from 14 May 91

Year 1991 Quarter 1

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Cleanup Completed By (signature).
Bldg. 2 Col. 10F	6417742	3/18/91	CLEAN	<i>[Signature]</i>				
Bldg. 2 Col. 10F	6622447	3/18/91	CLEAN	<i>[Signature]</i>				
Bldg. 2 Col. 10B	6417758	3/18/91	SEEP	<i>[Signature]</i>	CLEAN CAP & CHAIN JOINT BELOW LIQUID LEVEL GUAGE	Completed	3/22/91	<i>[Signature]</i>
Bldg. 2 Col. 10B	6640615	3/18/91	CLEAN	<i>[Signature]</i>				
Bldg. 2 Col. 25F	6417737	3/18/91	CLEAN	<i>[Signature]</i>				
Bldg. 2 Col. 25F	6622457	3/18/91	CLEAN	<i>[Signature]</i>				
Bldg. 2 Col. 25BBC	6417746	3/18/91	SEEP	<i>[Signature]</i>	CLEAN BOTTOM SOUTHWEST DRAIN COCK	Completed	3/22/91	<i>[Signature]</i>
Bldg. 2 Col. 25BBC	6622443	3/18/91	SEEP	<i>[Signature]</i>	CLEAN BOTTOM SOUTHWEST DRAIN COCK	Completed	3/22/91	<i>[Signature]</i>
Bldg. 2 Col. 26C	1760035	3/18/91	CLEAN	<i>[Signature]</i>				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just under a gallon) must be reported immediately to MCAir Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

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Cloths and gloves used in minor cleanup of PCB fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

**VISUAL INSPECTION AND MAINTENANCE RECORDS**  
**CONFIRMED PCB-CONTAMINATED TRANSFORMERS (50-500 ppm PCB) Pg. 1 of 1**

Year 1993 Quarter 2

Dept. 898 receipt by: \_\_\_\_\_  
 Date/Time received: \_\_\_\_\_

Transformer Location	Transformer Number	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Completed (signature)
Sub-Station 8	008HVT2	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 8	008HVT1	6/14/93	MODERATE LEAK < 10Z	L. Hoffmeyer	CLEAN BOTTOM OF C.V. CONNECTION BOX & GRAVEL BELOW	Cleaned As Required 6-15		T.B. & M.
Sub-Station 8	008HVT4	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 8	008HVT3	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 44	6147466	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 44	6147467	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 20	020HVT3	6/14/93	MODERATE LEAK < 10Z	L. Hoffmeyer	CLEAN BOTTOM OF JUB FROM NORTH COOLING FIN & PAD UNDERNEATH	Cleaned As Required 6-16		T.A. & J.
Sub-Station 20	020HVT2	6/14/93	CLEAN	L. Hoffmeyer				
Sub-Station 20	020HVT1	6/14/93	MODERATE LEAK < 10Z	L. Hoffmeyer	CLEAN BOTTOM DRAIN COCK & PAN UNDERNEATH	Cleaned As Required 6-16		T.A. & J.
Sub-Station 20	020HVT5	6/14/93	CLEAN	L. Hoffmeyer				

This sheet last revised on 09/13/89

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EPA regulations require annual inspection of PCB-contaminated (50-500 ppm) transformers. MCAIR policy is to inspect them quarter to ensure that any leakage is detected prior to serious spread of contaminated oil.

A "Clean" transformer has no PCB's on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates that there is PCB fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. "Moderate Leak" means PCB fluid is running off or is about to run off the external surface of the transformer.

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Attachment 4/0

VISUAL INSPECTION AND MAINTENANCE RECORDS  
PCB TRANSFORMERS (>500 ppm PCB) Pg. 2 of 2

Year 1993 Quarter 2

Dept. 898 receipt by: \_\_\_\_\_  
Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Complete (signature)
Bldg. 3 Basement	None		REMOVED					
Bldg. 5 E. of Bldg.	6622465	6/14/93	CLEAN	L. J. Hoffmeyer				
Bldg. 27 Car Bottom Furnace	917139		REMOVED					
Bldg. 27 Trans Rm 21	7103069		REMOVED					
Bldg. 27 Trans Rm 21	7103077		REMOVED					
Bldg. 27 Trans Rm 22	7103068		REMOVED					
Bldg. 27 Trans Rm 22	7103075		REMOVED					
Bldg. 27 Heat Treat Bsmnt.	YOP70491		REMOVED					
Bldg. 42 Room 110	6335506		REMOVED					
Bldg. 42 Room 110	5699110		REMOVED					
Bldg. 43 SS of Bldg.	ULP-1	6/14/93	MODERATE LEAK < 102	L. J. Hoffmeyer	CLEAN BOTTOM OF L.V. CONNECTION BOX & PAD UNDERNEATH	Cleaned As Required	6-15	T.B. &
Bldg. 102 Col. 11A	9M2588	6/14/93	CLEAN	L. J. Hoffmeyer				
Bldg. 103 Compressor Rm	29314	6/14/93	SEEP	L. J. Hoffmeyer	CLEAN BOTTOM OF TAP CHANGING & NAMEPLATE	Cleaned As Required	6-15	B.H.
Bldg. 103 Compressor Rm	29315	6/14/93	CLEAN	L. J. Hoffmeyer				

This sheet last revised on 09/13/89

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just one gallon) must be reported immediately to MCAIR Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

Quarterly inspections may take place any time during the periods January-March, April-June, July-September, and October-December, as long as there is a minimum of 30 days between inspections.

A "Clean" transformer has no PCB's on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates there is PCB fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. "Moderate Leak" means PCB fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of PCB fluid must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bags, but must be taken to Sub 8 by the end of each shift.

4 Del on 44

**VISUAL INSPECTION AND MAINTENANCE RECORDS**  
**POTENTIALLY PCB-CONTAMINATED TRANSFORMERS \* (50-500 ppm PCB)** Pg. 1 of 1

Year 1993 Quarter 2

Dept. 898 receipt by: \_\_\_\_\_  
 Date/Time received: \_\_\_\_\_

Transformer Location	Serial #	Date of Inspec.	Clean, Seep, or Moderate Leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Service Date	Service/Complete (signature)
Sub-Station 8	2689-1	6/14/93	CLEAN	L. Hollinger				
Sub-Station 8	4014-1	6/14/93	CLEAN	L. Hollinger				
Sub-Station 8	2112329	6/14/93	CLEAN	L. Hollinger				
Sub-Station 8	2112328	6/14/93	CLEAN	L. Hollinger				
Sub-Station 8	2112330	6/14/93	CLEAN	L. Hollinger				
Sub-Station 44	6147465		REMOVED					
Bldg. 6 West side	2710-1	6/14/93	CLEAN	L. Hollinger				
Bldg. 6 West side	2710-2	6/14/93	CLEAN	L. Hollinger				
Bldg. 6 West side	2710-3	6/14/93	CLEAN	L. Hollinger				
Bldg. 51 South side	3 on pole	6/14/93	CLEAN	L. Hollinger				

This sheet last revised on 09/13/89

\* These are transformers that have not been sampled and analysed due to limiting conditions. EPA regulations require that all mineral oil transformers be treated as potentially PCB-contaminated (50-500 ppm PCB).

IF A TRANSFORMER IS FOUND TO HAVE A "MODERATE LEAK", EPA REGULATIONS REQUIRE CLEANUP TO BE INITIATED WITHIN 48 HOURS. IF A MODERATE LEAK CANNOT BE STOPPED VIA ROUTINE MAINTENANCE METHODS, NOTIFY MCAIR ENVIRONMENTAL COMPLIANCE AT 23319 TO INITIATE LEAK CONTAINMENT, DAILY VERIFICATION, AND EMERGENCY REPAIR/REPLACEMENT OF THE TRANSFORMER. Leakage of PCB's over 10 lbs. (just under 1 gallon) must be reported immediately to MCAir Environmental Compliance at 23319 (first shift) or through the MDC Operator (other times). Any leakage reaching soil, sewers, the outdoor environment, or beyond indoor substations must also be reported immediately.

EPA regulations require annual inspection of PCB-contaminated (50-500 ppm) transformers. MCAIR policy is to inspect these transformers quarterly to ensure that any leakage is discovered prior to serious spread of contaminated oil.

A "Clean" transformer has no dielectric fluid on any portion of its external surface or on surrounding flooring/pad. A "Seep" indicates that there is dielectric fluid on the exterior surface, but it is not running off or about to run off the external surface of the transformer. A "Moderate Leak" means dielectric fluid is running off or is about to run off the external surface of the transformer.

Cloths and gloves used in minor cleanup of dielectric fluid that may be PCB-contaminated must be placed in the drum designated for that purpose, located in Substation 8. Cleanup materials can be carried from the worksite(s) to Substation 8 in closed plastic bag but must be taken to Sub 8 by the end of each shift.

4440 pg 3



YEAR 1997 QUARTER 1

## VISUAL INSPECTION AND MAINTENANCE RECORDS

Date/Time Recieved: 3/17/97 Signature: TS

Transformer Location	Serial #	Inspection Date	Clean, Seep, or Moderate leak?	Inspector Signature	Type/Location of Servicing Needed. Est. Amt. Leakage.	Servicing/Cleanup Description.	Label/Drum Check	Service Date	Service Completed By: (Signature)
<b>Confirmed PCB Contaminated Transformer (50-500 ppm PCB)</b>									
Substation 8	008HVT1	3/17/97	MODERATE LEAK < 10%.	<i>[Signature]</i>	CLEAN BOTTOM DRAIN COCK EPAD & L.V. CONNECTION BOX	Cleaned		3/19/97	GK, mwc
Substation 8	008HVT2	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 8	008HVT3	3/17/97	MODERATE LEAK < 10%.	<i>[Signature]</i>	CLEAN BOTTOM DRAIN COCK EPAD & L.V. CONNECTION BOX	Cleaned		3/19/97	GK, mwc
Substation 8	008HVT4	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 20	020HVT1	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 20	020HVT2	3/17/97	SEEP	<i>[Signature]</i>	CLEAN SOUTHWEST DRAIN PIPE ON BOTTOM OF EXPANSION TANK	Cleaned		3/19/97	GK, mwc
Substation 20	020HVT3	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 20	020HVT5	3/17/97	CLEAN	<i>[Signature]</i>					
<b>PCB Transformers (&gt; 500 ppm PCB's)</b>									
Bldg. 5 (east)	6622465	3/17/97	CLEAN	<i>[Signature]</i>					
<b>Potentially PCB Contaminated Transformer (50-500 ppm PCB)</b>									
Substation 8	2689-1	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 8	4014-1	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 8	2112329	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 8	2112328	3/17/97	CLEAN	<i>[Signature]</i>					
Substation 8	2112330	3/17/97	CLEAN	<i>[Signature]</i>					
Bldg. 6(west)	2710-1	3/17/97	CLEAN	<i>[Signature]</i>					
Bldg. 6(west)	2710-2	3/17/97	CLEAN	<i>[Signature]</i>					
Bldg. 6(west)	2710-3	3/17/97	CLEAN	<i>[Signature]</i>					
Bldg. 51		3/17/97	CLEAN	<i>[Signature]</i>					
(S. on pole)									

 Attachment 41  
 Analytical Chemistry • Research • Field Studies

Dept. 447A Receipt by: \_\_\_\_\_



TELEPHONE OR CONFERENCE RECORD

File McDonnell Douglas Aerospace  
TELEPHONE

Date 5/20/97  
CONFERENCE

Incoming ( )

Field ( )

Outgoing (x)

Office ( )

SUBJECT 1991 1st Quarter Inspection Report

PERSONS INVOLVED

Name

Representing

Mr. Gary Buford

MDA

Mr. Robert Krager

MDNR/HWP

SUMMARY OF CONVERSATION While writing my inspection report I found that I  
somehow failed to get copies of the PCB-contaminated and potential  
PCB-contaminated transformer inspection reports for the 1st Quarter of 1991.  
I called Mr. Buford and asked him to <sup>Fax</sup> send me a copy. The copy  
I received <sup>also</sup> contained the PCB transformer inspection report for the 1st Quarter  
of 1991, which I already had. I also asked if he could send me a list  
of their internal transformer numbers with the corresponding serial numbers for  
ACTION TAKEN the transformers in Sub 8 and Sub 20.

FINAL RESULTS

Robert H. Krager

Signature

**MCDONNELL DOUGLAS AEROSPACE/ST. LOUIS  
ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES  
BUILDING 110/LEVEL 1/MC 1111099  
(314) 234-7177 (FAX)**

**DATE:** 5/22/97

**TO:** ROBERT KRAUER **FROM:** GARY BUFORD  
**DEPT:** Mo DNR **DEPT:** 464c  
**EXT:** 751-3176 **EXT:** 234-8171  
**LOCATION:** Jeff City **LOCATION:** MDA. ST. L  
**FAX #:** (573) 751-7869  
**PAGE(s) SENT:** 2 **(INCLUDES LEAD SHEET)**

**PLEASE CALL:** \_\_\_\_\_ **AT EXTENSION:** \_\_\_\_\_

**IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION.**

**ADDITIONAL INFORMATION:**

RECEIVED  
97 MAY 21 PM 2 00  
HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Attachment 43

PCB S/N's

MDC TRANSFORMER # (PCB CONTAMINATED)	MDC TRANSFORMER S/N PCB CONTAMINATED	GALLONS	PCB (ppm)	WEIGHT (KG)
008HVT1	S/N 6993933	847	<69.4	3049
008HVT2	S/N 2494419	1060	<73.7	3816
008HVT3	S/N 9U1235	7100	<104.8	25560
008HVT4	S/N 2120050	760	<52.3	2736
020HVT1	S/N 2694974	1654	89.4	5954
020HVT2	S/N 2694972	1654	97.6	5954
020HVT3	S/N 2694937	1654	91.5	5954
020HVT5	S/N PGR48563	2153	108.5	7751

PCB S/N's

MDC TRANSFORMER # (PCB CONTAMINATED)	MDC TRANSFORMER S/N PCB CONTAMINATED	GALLONS	PCB (ppm)	WEIGHT (KG)
008HVT1	S/N 6993933	847	<69.4	3049
008HVT2	S/N 2494419	1060	<73.7	3816
008HVT3	S/N 9U1235	7100	<104.8	25560
008HVT4	S/N 2120050	760	<52.3	2736
020HVT1	S/N 2694974	1654	89.4	5954
020HVT2	S/N 2694972	1654	97.6	5954
020HVT3	S/N 2694937	1654	91.5	5954
020HVT5	S/N PGR48563	2153	108.5	7751

AT 43 pg 2

# ENVIRONMENTAL ANALYSIS, INC.

ANALYTICAL CHEMISTRY - RESEARCH - FIELD STUDIES

3278 N. LINDBERGH BLVD.

FLORISSANT, MO. 63033

PHONE 1-314-921-4488



Date 06-10-83  
Report No. 12234  
Lab No. -  
P.O. No. G2E920C

Mr. J. C. Patterson  
McDONNELL DOUGLAS CORP.  
Post Office Box 516  
Dept. 191C; Bldg. 102  
St. Louis, MO 63166

## REPORT OF ANALYSIS

Subject: Determination of Polychlorinated Biphenyls (PCB's) via  
Electron Capture Gas Chromatography.

### Sample Identification:

2689-1

- #1 - 3617, Transformer Oil Sub. 8, 6-2-83.
- #2 - 3622, PMR 12865, #750265, 6-3-83.
- #3 - 3623, PMR 35975, USN 904229, 6-6-83.

### Results of Analysis:

	# 1	# 2	# 3
PCB, ppm	500	<1	<1

Respectfully submitted,

R. M. Ferris, Director

Attachment 44

ERGH  
MO. 63033

ENVIRONMENTAL  
ANALYSIS  
INC.

PHONE  
1-314-921-4488

*Enclosure 1*

Date 07-13-83  
Report No. 12464  
Lab No. 126-23  
P.O. No. G2E920C

Mr. J. C. Patterson  
McDONNELL DOUGLAS CORP.  
Post Office Box 516  
Dept. 191C; Bldg. 102  
St. Louis, MO 63166

REPORT OF ANALYSIS  
-----

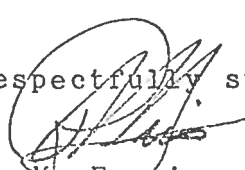
Subject: Determination of Polychlorinated Biphenyls (PCB's) via  
Electron Capture Gas Chromatography.

Sample Identification:  
#1 - No. 3644, Transformer (4014-1) Oil - Sub 8, 30 June 83.

Results of Analysis:

	# 1
	----
PCB, ppm	13
Type	1260

Respectfully submitted,

  
R. M. Ferris, Director

*Attachment 4/5*



Photo 1 Depicts entry door to the PCB storage area showing it was marked M<sub>L</sub>.



Photo 2 Depicts a drum of PCB oil and three drums of fluorescent light ballasts in the PCB storage area.

Attachment 46





Photo 3 Depicts one half of the inside of the PCB storage area.

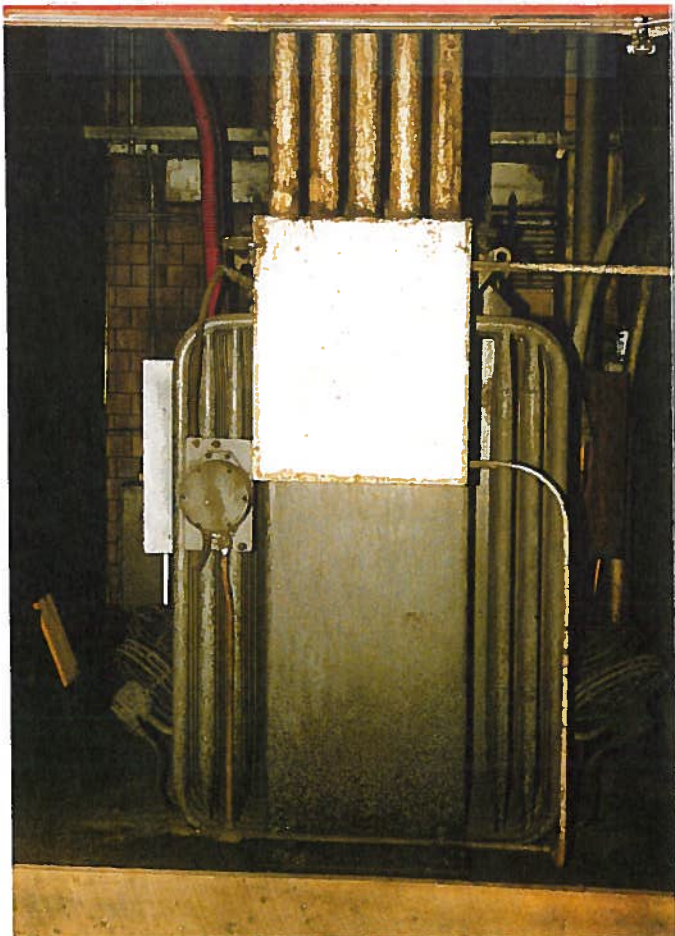


Photo 4 Depicts the PCB transformer in Building 5.

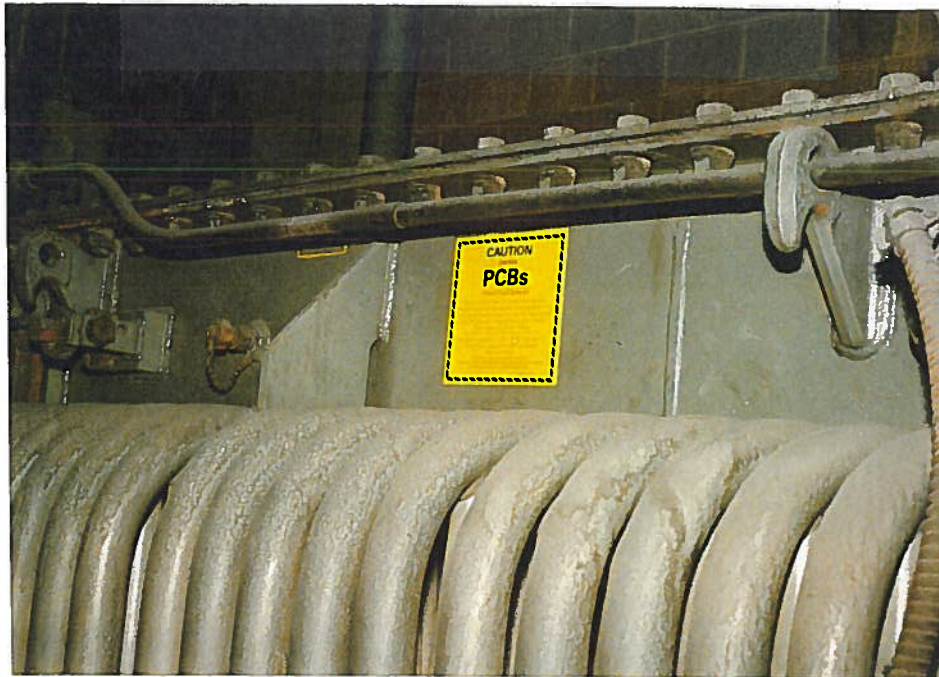


Photo 5 Depicts the PCB transformer in Photo 4 showing it was marked  $M_L$ .



Photo 6 Depicts the entry door to the PCB transformer in Photo 4 showing it was marked  $M_L$ .





Photo 7 Depicts three untested transformers at Building 6.



Photo 8 Depicts the two leaking untested transformers at Building 6.



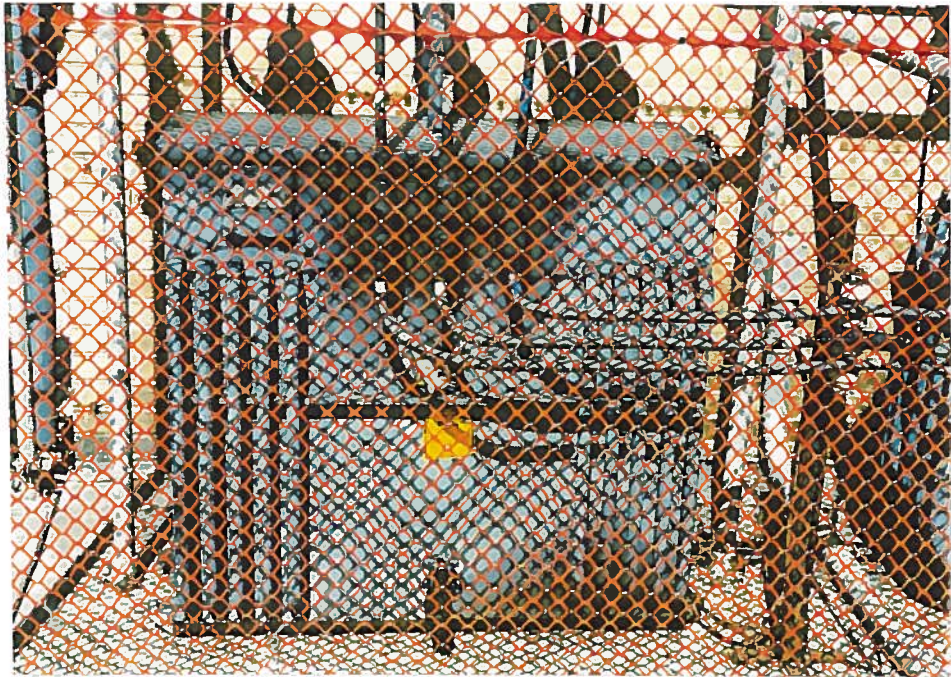


Photo 9 Depicts untested Pennsylvania transformer SN 2689-1 leaking around the bushings and cooling fins to the concrete pad below.

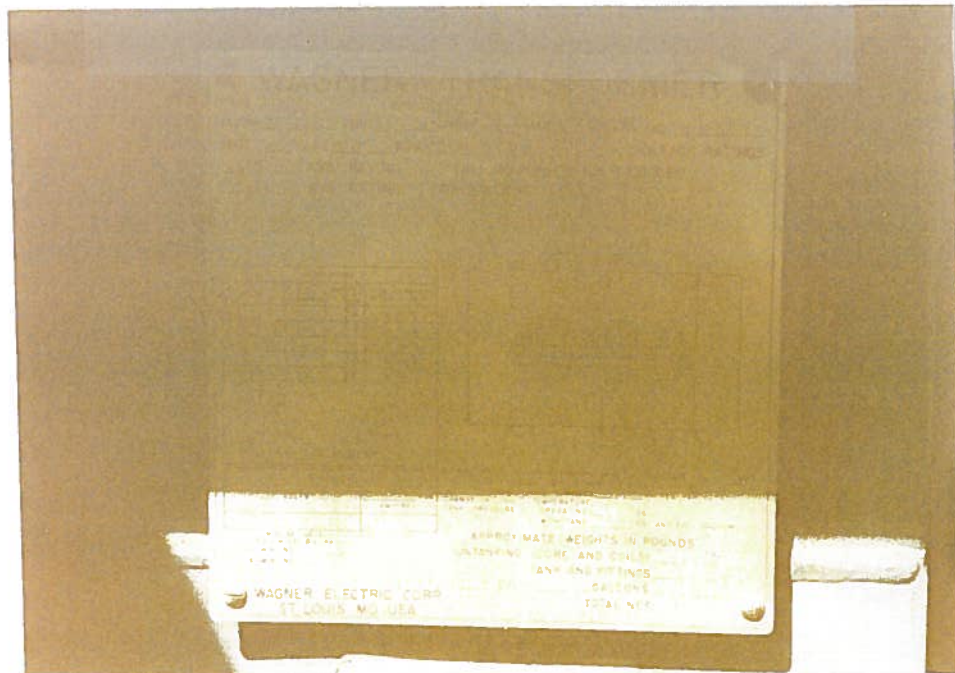


Photo 10 Depicts the nameplate for PCB-contaminated Wagner transformer SN 9U1235 in Substation 8.

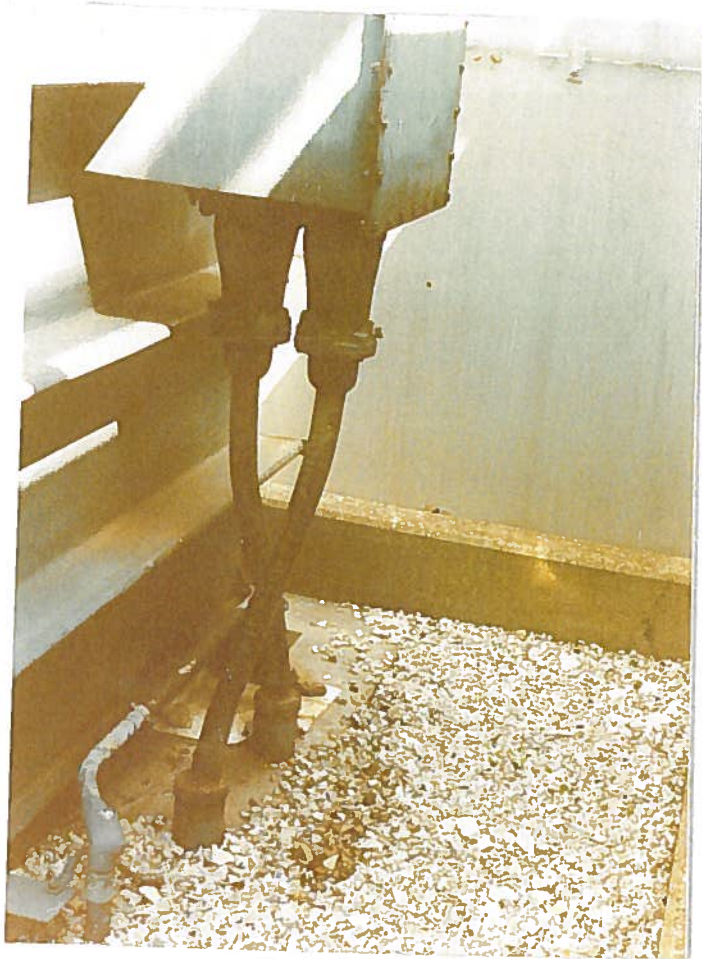


Photo 11 Depicts the L.V. connection box of the transformer in Photo 10, showing it was leaking onto the ground.



Photo 12 Depicts the drain valve of the transformer in Photo 10, showing it was leaking onto the concrete pad.



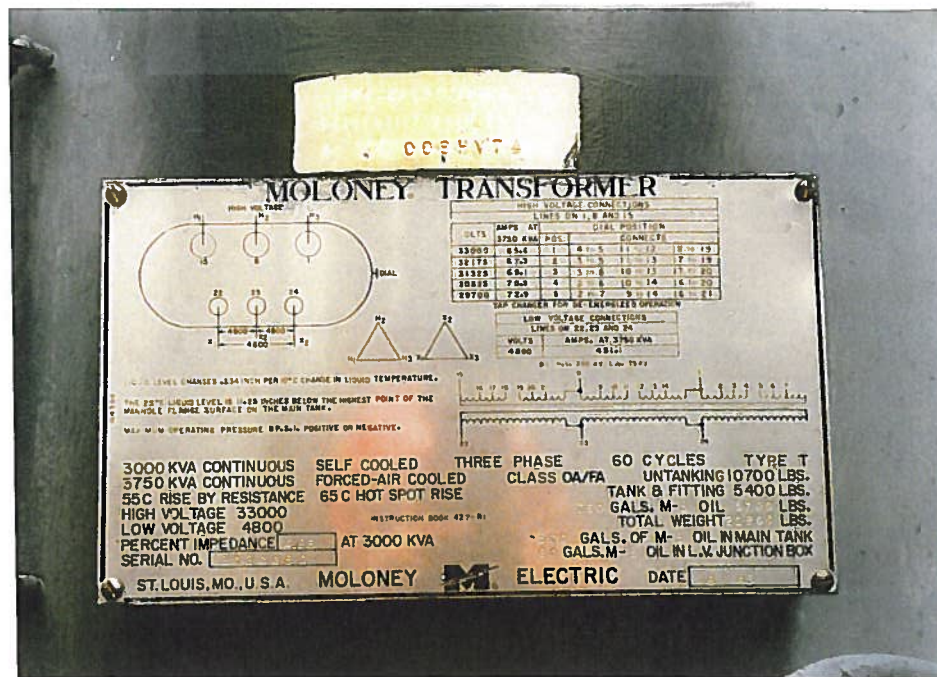


Photo 13 Depicts the nameplate of PCB-contaminated Moloney transformer SN 2120050.

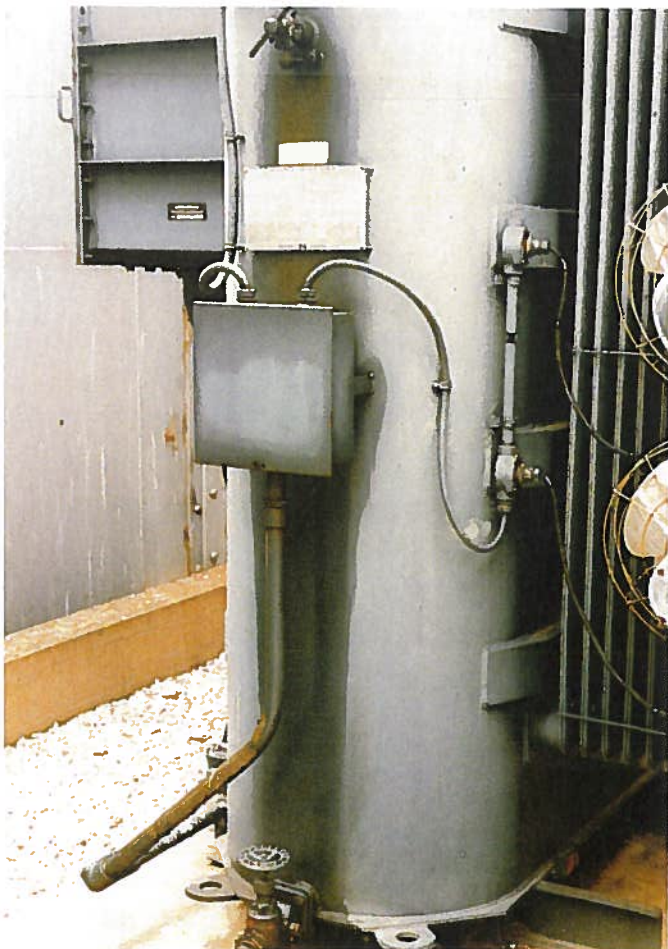


Photo 14 Depicts the transformer in Photo 13, showing it was leaking from the tapchanger and drain valve.

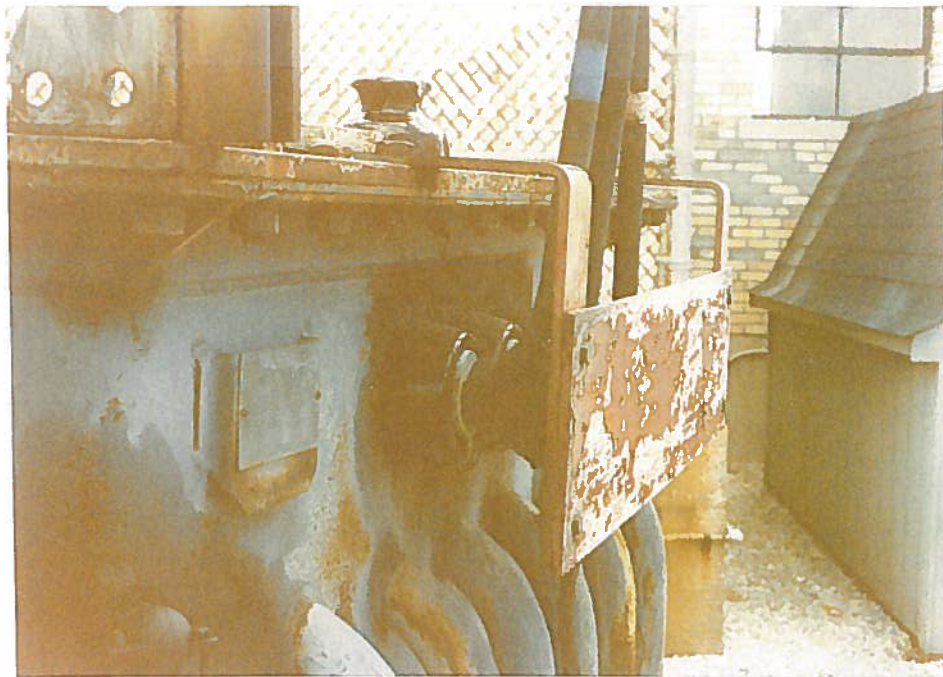


Photo 15 Depicts untested Kuhlman transformer SN 04729 leaking around the bushings and oil level gauge.

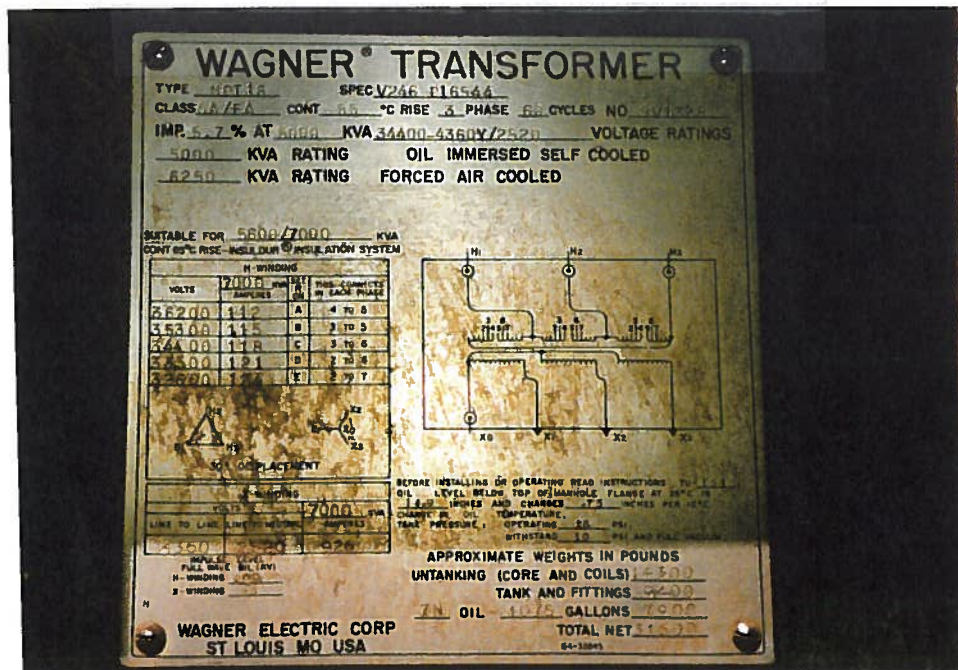


Photo 16 Depicts the nameplate of Wagner transformer SN 9V1328 in substation 20.





Photo 17 Depicts stain below the drain valve of the transformer in Photo 16.

PTTS INSPECTIONS

\*INSPECTION DATE: 05/12/97 \*INSPECTOR NUM: M001T \*INSPECTION SEQ: 01  
 \*LEGISLATION IND: (T) or F \*INSPECTION TYPE: GPS  
 \*REGION/STATE: MO INSPECTOR NAME: Robert L. Krager  
 \*REASON FOR INSPECTION: FCG REFERRAL TYPE: \_\_\_\_\_ \*NUMBER OF SAMPLES: 0  
 DATE RPT RECD: 1/1/ WARRANT REQUIRED: Y or (N) FED FACILITY: Y or (N)  
 CBI: Y or (N) NUMBER SCHOOLS: \_\_\_\_\_ SCHOOL TYPE: \_\_\_\_\_  
 \*FACILITY FUNCTION: US EPA ESTAB: \_\_\_\_\_

REMARKS: 07-97-T-229

\*SITE NAME: McDonnell Douglas Aerospace  
 \*SITE ADDR: Bldg 110, P.O. Box 516, 140 McDonnell Blvd  
 \*SITE CITY: St. Louis  
 \*SITE STATE: MO \*SITE ZIP: 63166  
 SITE DUNS: \_\_\_\_\_ SITE COUNTY: St. Louis  
 SITE SIC CODES: 3700 \_\_\_\_\_

\*PARENT CO NAME: Same  
 \*PARENT CO ADDR: \_\_\_\_\_  
 \*PARENT CO CITY: \_\_\_\_\_  
 \*PARENT CO STATE: \_\_\_\_\_ \*PARENT CO ZIP: \_\_\_\_\_

Robert L. Krager  
 INSPECTOR'S SIGNATURE

05/14/97  
 DATE